United States General Accounting Office

GAO

Report to Congressional Committees

April 2001

DEFENSE INFRASTRUCTURE

Military Services Lack Reliable Data on Historic Properties

GAO-01-437

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G A O
Accountability * Integrity * Reliability

United States General Accounting Office
Washington, DC 20548

April 6, 2001

Congressional Committees

The National Historic Preservation Act of 1966[1] established a national program to provide for the ongoing identification and protection of historic properties.[2] Under the act, a historic property is one that is listed on or eligible for the National Register of Historic Places. The Floyd D. Spence National Defense Authorization Act for Fiscal Year 2001[3] required us to review historic properties within the Department of Defense (DOD). Accordingly, our objectives were to assess the services' current and projected inventories of historic properties and the cost of maintaining and repairing these properties. For purposes of this review, we limited our assessment of historic properties to buildings and structures—the predominant types of historic properties in the Department of Defense.

Results in Brief

The military services do not have complete and reliable data on the number of their historic properties. None of the services have a centralized database that identifies all of their respective historic properties. Available data indicates that the services have about 17,300 historic properties—about 10,100 in the Army.[4] This represents less than 5 percent of all Department of Defense facilities. However, because of inconsistencies between the services' real property databases and cultural resource records, and the lack of an inventory of properties that are eligible for listing on the National Register, the reliability of this number is questionable. Nearly all historic buildings are currently in use as family

[1]P.L. 89-665, as amended, is codified at 16 U.S.C. 470 et. seq.

[2]The National Park Service administers the National Register and it defines five types of historic properties. Buildings are defined as any construction sheltering human activity. Structures are defined as any constructions other than for human shelter and include such items as airplanes, bridges, and highways. Objects are distinguished from buildings and structures based on being artistic in nature and small in scale and include monuments, boundary markers, and statuary. A site is a location of significance such as a battlefield, cemetery, or shipwreck and also includes archeological locations. A district is defined as "possessing a significant concentration, linkage, or continuity of buildings, structures, objects, or sites united historically or aesthetically by plan or physical development."

[3]P.L. 106-398, sec. 393.

[4]This figure excludes World War II wooden buildings that have been approved for demolition.

housing or office space. Although a large number of buildings will need to be evaluated over the next 10 years, it is uncertain how many of these buildings will meet the criteria and become eligible for listing on the National Register.

Data is not readily available to identify the costs of maintaining historic properties or to separately account for repairs related to the historic aspects of these properties. The services do not account separately for or otherwise distinguish between money spent to maintain and repair historic properties and that spent on nonhistoric properties. Therefore, we were unable to determine composite maintenance and repair costs specific to the Department's historic properties. Cost data we examined at several installations showed that overall, the day-to-day maintenance conducted on historic properties was similar to maintenance on nonhistoric properties. However, the costs of such maintenance can be proportionally greater where historic properties are larger in size than current military requirements. This is especially true of historic military family housing. At the same time, replacement of unique historical features such as large porches, windows, and slate or tile roofs can result in higher maintenance and repair costs for historic properties in the year the work is performed.

We are making a recommendation to the Secretary of Defense to require the military services to update their real property databases to ensure an accurate inventory of properties that are listed and eligible for listing on the National Register of Historic Places. The Department of Defense agreed with our recommendation.

Background

The National Historic Preservation Act of 1966 established a national historic preservation program to provide for the ongoing identification and protection of historic properties. An historic property is any building, structure, object, site, or district listed on or eligible for inclusion in the National Register of Historic Places. To be eligible for the National Register, a property must meet one of the following criteria: (1) be associated with historic events or activities, (2) be associated with important people, (3) embody distinctive design or physical characteristics, or (4) have potential to provide important information about prehistory or history. In addition, the property generally has to be 50 years of age or older.

The act generally requires federal agencies to identify, evaluate, and nominate historic properties under agency control to the National Register of Historic Places. The Office of the Deputy Under Secretary of Defense

for Environmental Security implements the act within DOD and requires each military service to designate federal preservation officers to coordinate its historic property program. As part of the program, the services require each installation to prepare an integrated cultural resources management plan[5] that should include an inventory of all known historic properties as well as an evaluation of properties that may be eligible for listing on the National Register. Once an installation completes its evaluation, it coordinates its recommendation with the State Historic Preservation Officer. If the state disagrees with the installation's recommendation, the decision can be elevated to the National Park Service. The military services maintain information on historic properties such as year acquired, square footage, and current use in their real property databases.

The act also requires that federal agencies (1) consider the effects of any maintenance, repair, or renovation on historic properties—both those on the National Register, as well as those eligible to be placed on the register, and (2) consult with the State Historic Preservation Officer to attempt to reach an agreement regarding actions that affect historic properties that is beneficial to all. Thus, when installation officials are about to begin work on a property either on or eligible for inclusion on the National Register, they should consult with the state about what work will be accomplished and what materials will be used; however, responsibility for funding the work remains with the Department of Defense. Each of the military services has reported backlogs of facilities maintenance and repair work in recent years, regardless of whether a property is historic or nonhistoric.

Data on the Number of Historic Properties Is Not Reliable

Although the military services maintain cultural resource records on historical properties and also real property databases, containing both historical and nonhistorical properties, they do not have complete and reliable data on the number of historic properties. None of the services have a centralized database that identifies all of their respective historic properties. Our analysis of data from the military services' real property databases and cultural resource records indicates the services have about 17,300 historic properties, most of which are in-use. However, results of military service auditor tests of additions, deletions, and modification transactions for fiscal year 1999 indicated that real property transactions were not promptly recorded. These problems, along with issues we

[5]Based on DOD Instruction 4715.3.

identified such as conflicting information between the Army's real property database and its cultural resource records, and the lack of information on Navy and Air Force properties that are eligible for listing, raise questions regarding the reliability of the services' information. Further, while there is a large number of properties that need to be evaluated over the next 10 years, it is uncertain how many of these properties will meet criteria and become eligible for listing on the National Register.

Although each service maintains a real property database that should indicate whether individual buildings and structures are historic properties, our work has shown that these databases are not reliable. For example, the Navy, Marine Corps, and Air Force systems only identify properties listed on the National Register, not other properties that are eligible for listing on the National Register. While the Army database includes both listed and eligible properties, it does not include all properties identified as historic in the cultural resource records. At the same time, questions exist regarding the accuracy and completeness of cultural resource records. The number of historic properties in table 1 represents our analysis of the services' real property databases and cultural resource records.

Table 1: Historic Properties by Service

	Number of historic properties		
Service	**Listed**	**Eligible**	**Total**
Army	[a]	[a]	**10,110**[b]
Navy	2,135	391[c]	**2,526**
Marine Corps	49	590[c]	**639**
Air Force	1,691	2,346[c]	**4,037**
Total			**17,312**

[a] Army data does not identify whether a property is listed on or eligible for the National Register.
[b] This figure excludes 8,254 buildings approved for demolition.
[c] These service real property databases do not include information on eligible properties; these numbers were developed from the services' cultural resource records.

Source: Our analysis of available service data.

While information included in table 1 provides the best available data on the number of historic properties, it is subject to certain limitations. The following examples highlight the problems we had in determining the number of historic properties within each service.

- The Army's real property database identifies 6,189 properties and its cultural resource records, maintained at each installation, indicate 8,593 properties as historic—excluding buildings approved for demolition.[6] Our comparison of information between the real property database and cultural resource records indicates the Army has 10,110 historic properties. Army officials stated that the additional properties included in the cultural resource records represent properties that are eligible for listing, but installations have not updated the real property database. For example, the cultural resource records identified 1,790 historic properties at Hawthorne Army Depot, Nevada, which were not identified as historic in the Army's real property database. About 1,533 of these historic properties are munitions storage structures. While a cultural resources official with the Army believes that the cultural resource records are more accurate than the database, he also has concerns about the accuracy of these records. For example, the cultural resource records indicate that there are 15 historic properties within the Military District of Washington.[7] According to the real property database, there are 576 historic properties within the District.

- The Navy's real property database identifies 1,283 historic properties, but our work indicates the Navy has at least 2,526 such properties. The real property database does not identify 855[8] historic properties included in the Pearl Harbor, Hawaii historic district. In addition, the database does not identify 295 family housing dwellings at various locations, 64 properties at Naval Shipyard Portsmouth, Maine, nor 32 properties at the Naval Academy, Maryland, as historic properties, eligible for listing on the National Register. The cultural resource office does not maintain records on properties eligible for listing on the register, so we could not determine how many properties might be eligible throughout the Navy. In addition, the facilities database identifies 66 properties built after 1950 as historic—

[6]The Army has a category of 8,254 historic buildings called "World War II Wood." DOD has an agreement with the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers that allows the Department to demolish all the buildings in this category. The Army plans to demolish most of its inventory of World War II Wood properties, and to maintain those for which there is an operational requirement. We did not include any buildings in this category in our Army total.

[7]The Military District of Washington includes the following Army posts with historic properties: Fort A.P.Hill, Fort Belvoir, Fort George G. Meade, Fort Hamilton, Fort McNair, and Fort Myer.

[8]The Navy is developing a programmatic agreement with the state of Hawaii regarding the potential reuse and demolition of some of these properties.

14 at the Naval Training Center Great Lakes, Illinois, and 11 at the U. S. Naval Academy, Maryland. However, cultural resource officials at both installations stated that none of these properties are historic. The remaining 41 properties are at locations we did not visit.

- The Marine Corps uses the same real property database as the Navy and it does not identify properties that are eligible for listing on the register. Our analysis of available cultural resource records at Marine Corps headquarters indicates there are 590 properties eligible for listing, including 239 at the Marine Corps Combat Development Center, Quantico, Virginia, and 210 at Marine Corps Base Camp Lejeune, North Carolina.

- The Air Force's cultural resource records indicate that there are 1,831 properties listed on the National Register. However, our analysis of the cultural resource data indicates that there are 1,691 properties[9] on the National Register. The difference occurs because the Air Force included (1) properties owned by the Army, (2) nonhistoric properties at some installations, and (3) properties that had been demolished. The Air Force cultural resource records also identify 2,346 eligible properties; however, the cultural resource office could not identify where 1,183 of these properties were located. An Air Force cultural resource official stated that the number of eligible properties was developed from a 1999 inquiry—telephone and e-mail responses—but no supporting documentation was retained. The remaining 1,163 eligible properties are family housing that the Air Force can identify by base.

Service officials stated they are aware of the inconsistencies in the number of historic properties between the real property databases and the cultural resource records. Army officials in the Office of the Assistant Chief of Staff for Installation Management stated that they are working to reconcile the inconsistencies. The Navy cultural resource manager agreed that the existing real property database does not accurately capture data on historic properties. He also acknowledged that the database does not distinguish between properties that are listed on the National Register and those determined to be eligible for listing and whether properties are part of a historic district or listed individually. However, he stated that the Navy is updating its real property database to allow it to make these distinctions.

[9]This includes 241 historic properties at base closure locations.

Most Historic Properties Are Being Used

Cultural resource officials in each of the service headquarters stated, and our own observations confirmed, that the majority of the historic properties are being used. About 36 percent of all historic properties are family housing dwellings. There were a relatively small number of vacant buildings at some of the installations we visited. In some cases, the installations were developing plans to lease these properties to the private sector.

At the installations we visited, 87, or about 4 percent, of the identified 2,395 historic properties were vacant. In some cases, the buildings were vacant because the base did not have sufficient funds to make the buildings usable and/or the structures were no longer needed for mission requirements. For example, 2 of the identified 65 historic properties at the Naval Training Center, Great Lakes, were vacant because, according to the installation's Director of Public Works, funds were not available to repair and update the property for administrative office space. At Portsmouth Naval Shipyard, Maine, there is no mission requirement for the naval prison structure there that has been closed since 1974. Navy officials at Portsmouth are trying to lease the prison building and six other historic properties to the private sector. Other locations are also developing plans to lease vacant buildings, including 40 historic buildings at Fort Sam Houston, Texas.[10]

Further, properties that were no longer needed to meet mission requirements and had lost their historical significance or structural integrity were demolished by each of the services. In fact, seven of the nine installations we visited had demolished or reached an agreement with their respective state preservation office to demolish certain historic properties. For example, officials at Fort Bliss, Texas, stated they have an agreement to demolish 24 historic properties as long as other historic properties are maintained. Likewise, 5 of the 107 original historic properties have been demolished at Scott Air Base, Illinois.

The Potential for Increased Numbers of Historic Properties in the Future Is Uncertain

According to service real property databases, about 73,600 properties within the services will turn 50 years of age over the next 10 years. However, the services will not know whether any of these properties are eligible for listing until the cultural resource officials at the various

[10] 10 U.S.C. 2667 allows DOD to lease nonexcess property to others. Section 111 of the National Historic Preservation Act also allows for the lease and/or exchange of historic properties.

military installations evaluate the properties using the National Register criteria. Nonetheless, service proposals to privatize[11] or demolish some family housing could significantly reduce this potential universe. In addition, the Army is considering a legislative proposal that would seek to exempt certain classes of property from future National Historic Preservation Act compliance, similar to the exemption DOD received on World War II wooden buildings. For example, the Army would like to exempt an entire class of Cold War era housing known as Capehart and Wherry housing from future National Historic Preservation Act compliance.

Table 2: Properties Reaching 50 Years of Age between 2001 and 2010 by Service

	Type of property		Total
Service	**Housing**	**Other**	
Army	15,538	12,260	**27,798**
Navy	8,072	4,187	**12,259**
Marine Corps	6,684	1,751	**8,435**
Air Force	16,167	8,965	**25,132**
Total	**46,461**	**27,163**	**73,624**
Percent	**63**	**37**	**100**

Source: Military service real property databases.

As seen in table 2, housing accounts for about 46,400, or about 63 percent, of the properties that will turn 50 years of age over the next 10 years. Service plans to privatize housing over the next several years could reduce the potential number of properties that would have to be evaluated by the services for listing on the National Register, as seen in the following examples.

- The Army plans to privatize 10,039 family housing dwellings, or about 65 percent of its housing.
- The Navy plans to privatize 910 family housing dwellings, or about 11 percent of its housing. In addition, the Naval Training Center, Great Lakes, has already determined that 338 family housing dwellings that will

[11]Congress authorized the Military Housing Privatization Initiative, which permitted DOD to enter into a variety of arrangements with private sector entities to build and renovate military housing both on or near military bases. (10 U.S.C. 2871-2885.)

reach 50 years of age over the next 10 years are not eligible for the National Register.

- The Marine Corps plans to privatize or demolish 4,008 family housing dwellings, or about 60 percent of its housing.

- The Air Force plans to privatize or demolish 8,504 family housing dwellings, or about 53 percent of its housing.

As previously stated, the potential eligibility of the remaining properties will not be known until installation cultural resource officials evaluate the properties to determine if they meet the National Register criteria. This should occur over the next 10 years as the properties reach 50 years of age. Although properties at the installations we visited comprise only a small portion of the properties that will turn 50 years of age over the next 10 years, cultural resource officials at most of these installations do not believe that many of these properties will be found to have historical significance or unique architectural features that would make them eligible for the National Register. For example, the cultural resource officer at Fort Bliss believes only 351 of the 1,911 properties, or 17 percent, turning 50 years of age over the next 10 years could be eligible for the National Register. In addition, installation plans call for the demolition of 302 of the 351 properties because they are family housing that needs to be replaced.

Information on the Cost to Maintain and Repair Historic Properties Is Not Readily Available

We were unable to determine composite maintenance and repair cost for fiscal year 2000 for DOD's historic properties because the services do not identify or account separately for the money spent to repair and maintain historic properties or to restore the historic aspects of these properties. Our analysis of cost data and interviews with officials at several installations indicate that the overall day-to-day maintenance and repair on historic properties is similar to maintenance and repair on nonhistoric properties. However, the cost of such maintenance can be proportionally greater where historic properties are larger in size than nonhistoric properties. This is especially true of historic military family housing. Replacement of unique historic features such as large porches, windows, and slate or tile roofs can also add to the cost of maintenance and repair in the year that the work is performed. However, some of these types of materials may be cost-effective from a life-cycle standpoint. The military services have provided annual budget exhibits to Congress that showed the inventory and the cost to maintain, repair, and improve historic family housing. The DOD eliminated the cost exhibit for the fiscal year 2002

budget submission, but it will still require the services to provide budget exhibits showing their inventory of historic housing.

The military services do not routinely track information on the overall cost to maintain and repair historic properties. In addition, they do not separately or otherwise distinguish between money spent to maintain historic properties and that spent on nonhistoric properties. Information obtained in our discussions with installation officials and review of maintenance and repair projects and costs indicated that the overall day-to-day maintenance of historic properties was similar to nonhistoric properties. Officials at most of the installations we visited noted that deciding which maintenance and repair projects to fund is based on mission and worse case conditions, and not on whether a property is historic or nonhistoric. Also, officials at each of the services noted growing backlogs of maintenance and repair projects that limit the amount of preventive maintenance that is done on historic as well as nonhistoric properties. They stated that trade-offs are often required to address the most critical needs.

In addition to lack of composite data on the costs of maintaining historic properties, limitations exist in the accuracy and reliability of data associated with maintaining DOD properties regardless of whether they are historic. Deficiencies identified by DOD auditors during financial audits raised questions of the reliability of the cost data recorded in the services' real property databases. For example, as a result of its fiscal year 1999 financial statement audit, Navy auditors identified millions of dollars of improved assets, including approximately $18.4 million in capital improvements to the Naval Facilities Engineering Command headquarters buildings, a historical property, that were not recorded in the Navy's real property database. In addition to previously reported deficiencies, we found problems with recorded cost data at military installations. At two of the three Army installations visited, we found maintenance and repair costs that should have been allocated to multiple properties but were allocated to only one or two properties. For example, a $385,767 project at Fort Leavenworth, Kansas, to paint and repair 17 housing units was allocated to 2 housing units. Likewise, a $98,250 project at Fort Sam Houston to repair porches on eight housing units was allocated to only one unit. An Army headquarters' housing official stated that he is aware that installations do not always accurately record cost information. We have previously reported on weaknesses in the Department of Defense's

financial management systems that limit the ability to consistently identify the cost of operations.[12] The Department has identified many actions to improve its financial management systems, but these actions are expected to require several years to complete.

While available information indicates that day-to-day maintenance and repair on historic properties is similar to such work on nonhistoric properties, prior DOD and service property reports have shown that the size of historic properties, especially historic military family houses, can result in costs being larger when compared to nonhistoric properties. For example, a 1997 Army family housing report to Congress[13] stated that the average historic house is 3,376 gross square feet while the average size of a nonhistoric house is 1,490 gross square feet. On a square foot basis, the report concludes routine maintenance and repair may be comparable between historic and nonhistoric properties, about $2.60 per square foot.[14] However, the study stated that "the larger the dwelling unit (more roof area, square feet of walls, and floors) the more maintenance and utilities funding required." The 1997 Navy report to Congress[15] and a February 2001 DOD report[16] provide similar data and conclusions.

At the same time, according to prior DOD and service historic reports and service officials we interviewed, the unique features of some historic buildings result in higher maintenance and repair costs. Some historic houses have slate or tile roofs, copper downspouts and gutters, or large wooden porches whereas most nonhistoric homes do not have these features. For example, at Fort Leavenworth, craftsmen repaired porches averaging about 800 square feet for about $20,757 each in fiscal year 1999. While repair or replacement of these features may represent sizeable costs in the year in which they occur, some of these types of materials may be cost-effective from a life-cycle standpoint. Service officials stated that while a shingle roof might cost less than a slate roof initially, if life-cycle costs are considered the cost may be the same, although the impact on an

[12] *Financial Management: Analysis of DOD's First Biennial Financial Management Improvement Plan* (GAO/AIMD-99-44, Jan. 29, 1999).

[13] *Report to Congress on Historic Army Quarters*, Mar. 1997.

[14] Fiscal year 1996 Army-wide family housing cost data from the Army's real property database.

[15] *Department of Navy's Response to Congress on Historic Preservation*, Apr. 1997.

[16] *The Cost of Maintaining Historic Military Family Housing*, Feb. 2001.

installation's budget may be greatest in the year in which the cost is incurred. Service officials stated that they know they must replace existing slate or tile roofs on historic properties with the same material, so they do not consider using any other material. As a result, they do not compare the cost of replacing a slate roof with a shingle roof.

Conclusion

Available information indicates that the military services do not have an accurate inventory of historic properties. The inventory of historic properties should include all properties that are listed on or eligible for the National Register of Historic Places to ensure that the military services have visibility over all historical properties. In addition, a complete inventory would ensure that the services are properly recording real property transactions, ensure the accuracy of reporting on real property required to be included in annual financial statements, and provide an improved basis for long-term planning of facility maintenance and repair. At the same time, composite data on the costs of maintaining historic structures is not readily available.

Recommendation for Executive Action

To ensure that the military services have an accurate inventory of historic properties, we recommend that the Secretary of Defense require the military services to update their real property databases to account for all properties that are listed or eligible for listing on the National Register of Historic Places.

Agency Comments

In written comments on a draft of this report, the Department of Defense concurred with our recommendation. The Department's comments are reprinted in appendix I. DOD also provided technical comments on our report, which we incorporated as appropriate.

Scope and Methodology

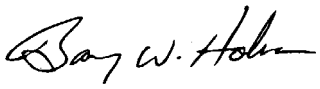
To determine the number of historic properties that the military services have, we obtained data from the Army, Navy, and Air Force, real property databases and the Army, Marine Corps, and Air Force cultural resource offices. We interviewed the Navy cultural resource manager regarding the location of historic properties since the Navy cultural resource office did not maintain a centralized record on the number of historic properties. We also obtained data regarding the number of (1) historic housing from each service's family housing office and (2) buildings that will reach 50 years of age over the next 10 years from the military services' real property databases.

To determine the availability of maintenance and repair costs of historic properties, we interviewed officials in the headquarters of each service's cultural resource and housing office. We learned that we would have to obtain maintenance and repair cost data from each installation that has historic properties because the services do not have a centralized system that tracks this cost information. We did obtain data on the funds spent to maintain historic properties at the installations we visited: Fort Bliss, Texas; Fort Leavenworth, Kansas; Fort Sam Houston, Texas; Naval Training Center, Great Lakes, Illinois; Naval Academy, Maryland; Portsmouth Naval Shipyard, Maine; Barksdale Air Force Base, Louisiana; Randolph Air Force Base, Texas; and Scott Air Force Base, Illinois. Finally, we interviewed officials at the installations visited and reviewed DOD reports regarding the cost to maintain historic versus nonhistoric properties. We did not independently verify the data DOD provided.

We conducted our review from October 2000 to February 2001 in accordance with generally accepted government auditing standards.

We are sending copies of this report to the Honorable Donald Rumsfeld, Secretary of Defense; The Honorable Joseph W. Westphal, Acting Secretary of the Army; the Honorable Robert B. Pirie, Jr., the Acting Secretary of the Navy; the Honorable Lawrence J. Delaney, Acting Secretary of the Air Force; Mr. Bruce A. Dauer, Deputy Comptroller, Office of the Secretary of Defense; and the Honorable Mitchell E. Daniels, Director, Office of Management and Budget. Copies will also be available to others upon request.

If you or your staff have any questions concerning this report, please contact me at (202) 512-8412. Key contributors to this report are listed in appendix II.



Barry W. Holman, Director
Defense Capabilities and Management

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Appendix I: Comments From the Department of Defense

ACQUISITION AND TECHNOLOGY

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON DC 20301-3000

March 30, 2001

Mr. Barry W. Holman
Director, Defense Capabilities
and Management
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Holman:

This is the Department of Defense response to the General Accounting Office (GAO) draft report, "DEFENSE INFRASTRUCTURE: Military Services Lack Reliable Data on Historic Properties," dated February 28, 2001 (GAO Code 709543/OSD Case 3048). The Department's technical comments have already been forwarded to your office for consideration and inclusion in your final report.

The Department of Defense concurs with the GAO recommendation that the Secretary of Defense require the military services to update their real property databases to account for all properties that are listed or eligible for listing on the National Register of Historic Places. The Office of the Secretary of Defense is already working with the military departments to improve the accuracy and reliability of real property databases to include data fields that will identify the historic properties as recommended in the draft report.

If you require additional information, please contact LTC William Windsor at (703) 604-5707. Thank you for your interest in this matter.

Sincerely,

Randall A. Yim
Deputy Under Secretary
(Installations)

Appendix II: GAO Contact and Acknowledgments

GAO Contact

William Crocker (202) 512-4533

Acknowledgments

In addition to the staff named above, Michael Kennedy, Richard Meeks, Paul Newton, and John Brosnan made key contributions to this report.

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