

Congress of the United States

House of Representatives

COMMITTEE ON OVERSIGHT AND GOVERNMENT REFORM

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April 17, 2025

The Honorable Pete Hegseth
Secretary
U.S. Department of Defense
1000 Defense Pentagon
Washington, DC 20301

Dear Secretary Hegseth:

As part of the Committee on Oversight and Government Reform’s investigation into “the regulatory costs, bad policies, and veiled special interests that defined the Biden Administration,”¹ the Committee is examining the Biden-era Department of Defense’s (Department) Readiness and Environmental Protection Integration Program (REPI). Specifically, the Committee is investigating the Biden Administration’s use of REPI to facilitate the sale of land easements adjacent to military bases to nonprofits with ties to the Chinese Communist Party (CCP) under the pretense of conservation.

REPI is designed as a “tool for combatting encroachment that can limit or restrict military training, testing, and operations.”² A key component of the program is the use of partnerships among “military services, private conservation groups, and state and local governments” to share the cost of easements and land near military bases.³ However, over the years, multiple Government Accountability Office (GAO) reports highlighted the Department’s shortcomings in adequately assessing the risks of foreign encroachment on federal lands.⁴ Further, the Committee is aware of reports indicating that some REPI partners may have affiliations or business operations in the People’s Republic of China (PRC) that merit closer examination given the risk posed by the CCP.

¹ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Doug Burgum, Sec’y, U.S. Dep’t of the Interior, et al. (Feb. 18, 2025).

² *About REPI*, U.S. DEP’T OF DEFENSE READINESS AND ENVIRONMENTAL PROTECTION INTEGRATION PROGRAM, available at <https://www.repi.mil/About-REPI/Frequently-Asked-Questions/>; 10 U.S.C. § 2684a (2003).

³ U.S. DEP’T OF DEFENSE, THE DEPARTMENT OF DEFENSE’S READINESS AND ENVIRONMENTAL PROTECTION INTEGRATION (REPI) PROGRAM: A GUIDE FOR STATE, LOCAL, AND PRIVATE PARTNERS, at 1 (Mar. 2022) [hereinafter *Guide for State, Local, and Private Partners*].

⁴ U.S. GOVERNMENT ACCOUNTABILITY OFFICE, GAO-15-149, DEFENSE INFRASTRUCTURE: RISK ASSESSMENT NEEDED TO IDENTIFY IF FOREIGN ENCROACHMENT THREATENS TEST AND TRAINING RANGES, at 11 (Dec. 16, 2014) [hereinafter 2014 GAO Report]; U.S. GOVERNMENT ACCOUNTABILITY OFFICE, GAO-16-381R, DEFENSE INFRASTRUCTURE: DOD HAS MADE LIMITED PROGRESS IN ASSESSING FOREIGN ENCROACHMENT RISKS ON FEDERALLY MANAGED LAND, at 1, 5 (Apr. 13, 2016) [hereinafter 2016 GAO Report].

REPI typically enables the Department to partner with private organizations to purchase easements—legal agreements restricting land use around military bases.⁵ These efforts are known as “buffer projects”⁶ and may take conservation into consideration in order to preserve habitats and land.⁷ However, reports indicate The Nature Conservancy, a REPI partner involved in 34 buffer projects, has ties to the CCP.⁸ Additionally, employees of The Nature Conservancy’s China Program have held positions within the CCP, including roles at the Chinese People’s Political Consultative Conference, the United Front Working Department, China’s State Economic and Trade Commission, the Ministry of Science and Technology, and the Ministry of Ecology and Environment.⁹ In addition, these employees have contributed articles to the state-run publication *People’s Daily*.¹⁰

CCP influence campaigns seek to “advance China’s international ambitions through non-state channels, focusing on subnational foreign governments, political figures, and non-governmental organizations...”¹¹ This effort is part of United Front work, “a strategy through which the CCP seeks to influence the political climate at large.”¹² The Committee also found that two additional organizations listed as partners on the Department’s REPI website—Rio Tinto and Rayonier—appear to have offices in the PRC or have worked with organizations affiliated with the CCP.¹³ The National Counterintelligence and Security Center cautioned U.S. businesses with a presence in the PRC that the CCP has legal grounds for “accessing and controlling data held by U.S. firms in China... the laws may also compel locally-employed PRC nationals of U.S. firms to assist in PRC intelligence efforts.”¹⁴ These REPI partnerships are particularly worrying given the proximity of projects to military installations. CCP access to buffer projects could pose

⁵ Guide for State, Local, and Private Partners, *supra* n. 4.

⁶ *Buffer Projects*, U.S. DEP’T OF DEFENSE READINESS AND ENVIRONMENTAL PROTECTION INTEGRATION PROGRAM, available at <https://www.repi.mil/Buffer-Projects/>.

⁷ Guide for State, Local, and Private Partners, *supra* n. 4 at 11.

⁸ *The Nature Conservancy*, U.S. DEP’T OF DEFENSE READINESS AND ENVIRONMENTAL PROTECTION INTEGRATION PROGRAM, available at <https://www.repi.mil/Buffer-Projects/Partner-List/The-Nature-Conservancy/>; Robert Schmad, *Major CCP-linked NGO receives tens of millions each year in federal grants*, THE WASH. EXAMINER (Jan. 6, 2025).

⁹ Robert Schmad, *Major CCP-linked NGO receives tens of millions each year in federal grants*, THE WASH. EXAMINER (Jan. 6, 2025).

¹⁰ *Id.*

¹¹ *Hearing on China’s Global Influence and Interference Activities: Hearing Before U.S.-China Economic and Security Review Comm’n*, written testimony of Emily de La Bruyère, Senior Fellow, Foundation for Defense of Democracies, at 10 (Mar. 23, 2023).

¹² H. COMM. ON OVERSIGHT & GOV’T REFORM, CCP POLITICAL WARFARE: FEDERAL AGENCIES URGENTLY NEED A GOVERNMENT-WIDE STRATEGY, at 27 (Oct. 24, 2024).

¹³ *REPI Program Partners*, U.S. DEP’T OF DEFENSE READINESS AND ENVIRONMENTAL PROTECTION INTEGRATION PROGRAM, available at <https://www.repi.mil/Buffer-Projects/Partner-List/>; *Rayonier chief receives Chinese award* THE TIMBER INDUSTRY MAGAZINE, available <https://www.tjonline.com/analysis/rayonier-chief-receives-chinese-award/>; and *Partnerships in Asia for Global Impact*, RIO TINTO, available at <https://www.riotinto.com/en/news/stories/partnerships-in-asia-for-global-impact>.

¹⁴ NAT’L COUNTERINTEL. & SEC. CTR., SAFEGUARDING OUR FUTURE- U.S. BUSINESS RISK: PEOPLE’S REPUBLIC OF CHINA (PRC) LAWS EXPAND BEIJING’S OVERSIGHT OF FOREIGN AND DOMESTIC COMPANIES, at 1 (June 20, 2023).

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great risk to U.S. military installations and attempts to breach U.S. installations are not without precedent.¹⁵

A 2014 GAO report concluded that “DOD has not conducted a risk assessment...assessing the degree to which foreign encroachment could pose a threat to the mission of the ranges.”¹⁶ Two years later, a subsequent GAO report found that the Department “made limited progress in assessing foreign encroachment on federally managed land” including near military installations.¹⁷ While existing GAO reports do not explicitly identify the REPI program as a potential security risk, the Department’s historical challenges in accurately evaluating these threats raise concerns about the program’s vulnerability.

In light of these concerns, the Committee requests a staff-level briefing on security risks and mitigation for REPI partnerships. The Committee on Oversight and Government Reform is the principal oversight committee of the U.S. House of Representatives and has broad authority to investigate “any matter” at “any time” under House Rule X. To schedule the briefing, please contact Committee on Oversight and Government Reform staff at (202) 225-5074. Thank you for your attention to this important matter.

Sincerely,


James Comer
Chairman

cc: The Honorable Gerald Connolly, Ranking Member
Committee on Oversight and Government Reform

¹⁵ Letter from James Comer, Chairman, H. Comm. on Oversight and Gov’t Reform, to Lloyd Austin, Sec’y, U.S. Dep’t of Defense and Christopher Wray, Director, FBI (Oct. 2, 2023);

Gordon Lubold, *et al. Chinese Gate-Crashers at U.S. Bases Spark Espionage Concerns*, THE WALL STREET JOURNAL (Sept. 4, 2023); and Mary K. Jacob, *Map shows Chinese-owned farmland next to 19 US military bases in ‘alarming’ threat to national security: experts*, NEW YORK POST (June 20, 2024).

¹⁶ 2014 GAO Report *supra* n. 5 at 11.

¹⁷ 2016 GAO Report *supra* n. 5 at 3, 5 (Apr. 13, 2016).