

June 2004

MILITARY TRAINING

DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements



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Highlights of [GAO-04-608](#), a report to congressional committees

Why GAO Did This Study

Section 366 of the National Defense Authorization Act for Fiscal Year 2003 required the Secretary of Defense to develop a report outlining a comprehensive plan to address training constraints caused by limitations on the use of military lands, marine areas, and air space that are available in the United States and overseas for training. The foundation for that plan is an inventory identifying training resources, capacities and capabilities, and limitations. In response to section 366, this report discusses the extent to which (1) the Office of the Secretary of Defense's (OSD) training range inventory is sufficient for developing the comprehensive training range plan and (2) OSD's 2004 training range report meets other requirements mandated by section 366.

What GAO Recommends

GAO recommends that OSD develop an integrated training range database that identifies available training resources, capacities and capabilities, and training constraints caused by encroachment and other factors; and makes several recommendations to enhance DOD's responsiveness to the legislative requirements. DOD disagreed with GAO's findings and three of its four recommendations. After reviewing DOD's comments, GAO continues to believe its recommendations are still valid.

www.gao.gov/cgi-bin/getrpt?GAO-04-608.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Barry W. Holman at (202) 512-8412 or holmanb@gao.gov.

MILITARY TRAINING

DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements

What GAO Found

OSD's training range inventory does not yet contain sufficient information to use as a baseline for developing the comprehensive training range plan required by section 366. As a result, OSD's training range report does not lay out a comprehensive plan to address training constraints caused by limitations on the use of military lands, marine areas, and air space that are available in the United States and overseas for training. First, OSD's training range inventory does not fully identify available training resources, specific capacities and capabilities, and existing training constraints caused by encroachment or other factors to serve as the baseline for the comprehensive training range plan. Second, OSD and the services' inventories are not integrated, readily available, or accessible by potential users so that commanders can schedule the best available resources to provide the required training. Third, OSD's training range report does not include a comprehensive plan with quantifiable goals or milestones for tracking planned actions to measure progress, or projected funding requirements needed to implement the plan. Instead, the report provides the current status of the four services' various sustainable range efforts in the United States, which if successful, overtime should provide a more complete picture of the magnitude and impact of constraints on training.

OSD's training range report does not fully address other requirements mandated by section 366. For example, the report does not:

- Fully assess current and future training range requirements.
- Fully evaluate the adequacy of current resources to meet current and future training range requirements in the United States and overseas.
- Identify recommendations for legislative or regulatory changes to address training constraints, even though the Department of Defense (DOD) submitted legislative changes for congressional consideration on April 6, 2004.
- Contain plans to improve readiness reporting.

Contents

Letter		1
	Results in Brief	3
	Background	5
	OSD's Training Range Inventory Does Not Yet Contain Sufficient Information to Use as a Baseline for a Comprehensive Plan	12
	OSD's Training Range Report Does Not Fully Meet Other Requirements Mandated by Section 366	14
	Conclusions	16
	Recommendations for Executive Action	18
	Agency Comments and Our Evaluation	18
	Scope and Methodology	22
Appendix I	Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003	26
Appendix II	Comments from the Department of Defense	29

Abbreviations

DOD	Department of Defense
OSD	Office of the Secretary of Defense

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United States General Accounting Office
Washington, DC 20548

June 4, 2004

Congressional Committees

For some time, senior Department of Defense (DOD) and military service officials have reported that they face increasing difficulties in carrying out realistic training at military installations due to training constraints, such as those resulting from encroachment.¹ Title III, section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003, dated December 2, 2002,² required that the Secretary of Defense develop a comprehensive plan for using existing authorities available to the Secretaries of Defense and the military services to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training. As part of the preparation of the plan, section 366 required the Secretary of Defense to conduct an assessment of current and future training range³ requirements and an evaluation of the adequacy of current DOD resources, including virtual and constructive assets, to meet current and future training range requirements. Section 366 further required the Secretary to submit the plan, the results of the assessment and evaluation, and any recommendations for legislative or regulatory changes to address training constraints in a report to the Congress at the same time the President submitted the budget for fiscal year 2004 and provide status reports annually between fiscal years 2005 and 2008 on implementation of the plan and any additional actions taken or to be taken. In addition, section 366 required the Secretary to develop and maintain an inventory that identifies all available operational training ranges, all training range capacities and capabilities, and any training constraints caused by limitations at each training range. We have previously reported on the need for an integrated and readily available or accessible comprehensive

¹ DOD defines “encroachment” as the cumulative result of any and all outside influences that inhibit normal training and testing. According to DOD, the eight encroachment factors are: endangered species habitat, unexploded ordinance and munitions constituents, competition for radio frequency spectrum, protected marine resources, competition for airspace, air pollution, noise pollution, and urban growth around military installations.

² P.L. 107-314, Title III, Section 366 (Dec. 2, 2002).

³ We use the term “training range” to collectively refer to air ranges, live-fire ranges, ground maneuver ranges, sea ranges, and operating areas.

inventory of the services' training ranges, capacities, and capabilities so that commanders can schedule the best available resources to provide the required training.⁴ Section 366 also required the Secretary of Defense to report to the Congress on the plans to improve the Global Status of Resources and Training System to reflect the readiness impact that training constraints caused by limitations on the use of military lands, marine areas, and airspace have on specific units of the military services. (See section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 in app. I.)

Instead of issuing the first report along with the President's fiscal year 2004 budget submission in 2003, the Office of the Secretary of Defense (OSD) submitted to the Congress its *Implementation of the Department of Defense Training Range Comprehensive Plan* report on February 27, 2004. In an effort to obtain assistance from the military services in preparing this report, the Under Secretary of Defense for Personnel and Readiness, in a January 2003 memorandum, directed each of the military services to develop a single standalone report that could be consolidated to form OSD's overall report.⁵ As such, OSD's report reflects the varying levels of detail provided by each service.

Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 also required that the Secretary of Defense provide us a copy of the annual training range report and that we must provide the Congress with our evaluation of these annual reports. This report discusses the extent to which (1) OSD's training range inventory contains sufficient information to use as a baseline for developing the comprehensive training range plan required by section 366, and (2) OSD's training range report meets other requirements mandated by section 366, such as an assessment of current and future training range requirements; an evaluation of the adequacy of current DOD resources, including virtual and constructive assets, to meet current and future training range requirements; any recommendations for legislative or regulatory changes

⁴ U.S. General Accounting Office, *Military Training: DOD Lacks a Comprehensive Plan to Manage Encroachment on Training Ranges*, [GAO-02-614](#) (Washington, D.C.: June 11, 2002).

⁵ Department of Defense, Under Secretary of Defense for Personnel and Readiness, *Guidance for Complying with the Provisions of Section 366* (Washington, D.C.: Jan. 28, 2003).

to address training constraints; and plans to improve the readiness reporting system.

To identify the extent that OSD's training range inventory contains sufficient information to use as a baseline for developing the comprehensive training range plan required by section 366, we reviewed the inventory contained in the OSD training range report and the services' inventory inputs to assess whether the inventory identified training capabilities (e.g., types of training that can be conducted and available targets), capacities (e.g., size of range or amount of training that can be accommodated), and constraints caused by encroachment for each training range.⁶ Also, we discussed the content of the inventories with knowledgeable OSD and service officials. To determine the extent to which OSD's training range report met other requirements mandated by section 366, we thoroughly reviewed the report for an assessment of current and future training range requirements; an evaluation of the adequacy of current DOD resources, including virtual and constructive assets, to meet current and future training range requirements; recommendations for legislative or regulatory changes to address training constraints; and plans to improve the readiness reporting system. In addition, we discussed the adequacy of OSD's report and the services' inputs with knowledgeable OSD and service officials and a representative of the contractor that prepared the report. Details about our scope and methodology appear at the end of this letter.

We conducted our work from December 2003 through April 2004 in accordance with generally accepted government auditing standards.

Results in Brief

OSD's training range inventory, which is a compilation of the individual services' inventories, does not contain sufficient information to use as a baseline for developing the comprehensive training range plan. As a result, OSD's report does not include a comprehensive plan to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training—as required by section 366. While OSD's training range inventory lists the services' training ranges and capabilities as of November 2003 and the individual service input documents provide more descriptive examples

⁶ We did not verify the completeness or accuracy of OSD's inventory or the services' inventory inputs.

of constraints on training than we have seen previously, they do not fully identify existing limitations on training. Also, these inventories are not integrated, readily available, or accessible by potential users so that commanders can schedule the best available resources to provide the required training. An integrated training range database that could be continuously updated and shared among the services at all command levels, regardless of service ownership, would make these inventories more useful to identify available training resources, specific capacities and capabilities, and training constraints caused by encroachment. Without an inventory that fully identifies available training resources, specific capacities and capabilities, and existing training constraints caused by encroachment, it is difficult to frame a meaningful plan to address such constraints. As a result, OSD's report does not contain a comprehensive plan to address training constraints on military training ranges caused by limitations on the use of training ranges, as required by section 366. Instead, the report provides the current status of the services' various sustainable range efforts, which if successful, overtime should provide a more complete picture of the magnitude and impact of constraints on training. Even so, OSD's report does not include quantifiable goals or milestones for tracking planned actions and measuring progress, or projected funding requirements. The absence of these elements is significant given the legislative requirement for OSD to report annually on its progress in implementing the plan.

OSD's report, which is a consolidation of information provided by the services, does not fully address several other requirements mandated by section 366. For example, the report does not:

- Fully assess current and future training range requirements. Instead, it mainly describes the services' processes to develop, document, and execute current training and training range requirements.
- Fully evaluate the adequacy of current DOD resources, including virtual and constructive assets, to meet current and future training range requirements. Instead, the report broadly describes the types of ranges the services need to meet their training requirements in the United States. It does not indicate whether those types of ranges exist; are in the needed quantity and location; and the degree to which encroachment or other factors, such as inadequate maintenance or modernization, impact the services' ability to train on those ranges, including whether the ranges have the instrumentation, target sets, or other infrastructure needed to meet current and future training range requirements.

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- Identify recommendations for legislative or regulatory changes to address training constraints, even though DOD submitted legislative changes for congressional consideration on April 6, 2004.
 - Contain plans to improve the readiness reporting system, called the Global Status of Resources and Training System. This reporting system was to capture the impact on readiness caused by training constraints.

To serve as the baseline for the comprehensive training range plan required by section 366, we are recommending that OSD and the military services jointly develop an integrated training range database that identifies available training resources, specific capacities and capabilities, and training constraints caused by encroachment and other factors, which could be continuously updated and shared among the services at all command levels, regardless of service ownership. To improve future reports, we recommend that OSD provide a more complete training range report to the Congress to fully address the requirements specified in the section 366 mandate by (1) developing a comprehensive plan that includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements to more fully address identified training constraints, (2) assessing current and future training range requirements and evaluating the adequacy of current resources to meet these requirements, and (3) developing a readiness reporting system to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges.

DOD disagreed with our findings that OSD's training range report failed to address the congressional reporting requirements mandated in section 366 and disagreed with three of our four recommendations. Our report outlined numerous instances where OSD's report did not address congressionally mandated reporting requirements. Our recommendations were intended to help DOD address all requirements specified in section 366. Without their implementation, DOD will continue to rely on incomplete information to support funding requests and legislative or regulatory changes to address encroachment issues. DOD's comments and our evaluation of them are discussed on pages 18-22.

Background

Over time, the military services report they have increasingly lost training range capabilities because of encroachment. According to DOD officials, the concerns about encroachment reflect the cumulative result of a slow but steady increase in problems affecting the use of their training ranges. Historically, specific encroachment problems have been addressed at individual ranges, most often on an ad hoc basis. DOD officials have

reported increased limits on and problems with access to and the use of ranges. They believe that the gradual accumulation of these limitations will increasingly threaten training readiness in the future. Yet, despite the reported loss of some capabilities, for the most part, the services do not report the extent to which encroachment has significantly affected training readiness.

Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003

Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 required that the Secretary of Defense develop a comprehensive plan for using existing authorities available to the Secretaries of Defense and the military departments to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training. Section 366 also required that the Secretary of Defense develop and maintain an inventory that identifies all available operational training ranges, all training range capacities and capabilities, and any training constraints at each training range. In addition, the Secretary must complete an assessment of current and future training range requirements and an evaluation of the adequacy of current DOD resources to meet current and future training requirements. Section 366 further required that the Secretary of Defense submit to the Congress a report containing the plan, the results of the assessment and evaluation of current and future training requirements, and any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints at the same time the President submits the budget for fiscal year 2004 and provide status reports on implementation annually between fiscal years 2005 and 2008. While the initial report was due when the President submitted the fiscal year 2004 budget to the Congress, the department did not meet this initial reporting requirement.

In an effort to obtain assistance from the military services in preparing this report, a January 2003 memorandum to the Secretaries of the Army, the Navy, and the Air Force, the Under Secretary of Defense for Personnel and Readiness directed that each of the military services develop a single standalone report that could be consolidated to form OSD's overall report. Each service was expected to provide an assessment of current and future training requirements with future projections to 2024, a report on the implementation of a range inventory system, an evaluation of the adequacy of current service resources to meet both current and future training requirements, and a comprehensive plan to address constraints resulting in adverse training impacts. The memorandum stated that once the services' inputs were received, they would be incorporated into a single

report to address the section 366 reporting requirement. As discussed more fully later, the services' inputs were incorporated to varying degrees in OSD's final training range report.

DOD and the Services' Sustainable Range Initiatives

In completing our analysis for this and other engagements related to training ranges, we found that the department and the military services individually have a number of initiatives underway to better address encroachment or other factors and ensure sustainability of military training ranges for future use. In August 2001, the department issued its draft *Sustainable Range Action Plans*,⁷ which contained an action plan for each of the eight encroachment issues. Each action plan provided an overview and analysis of its respective encroachment issue along with strategies and actions for consideration by DOD decision makers. The department considered these action plans to be working documents supporting the overall sustainable range initiative. In June 2003, the Under Secretary of Defense for Personnel and Readiness issued a memorandum to the secretaries of the military departments providing guidance for sustainable range planning and programming efforts for fiscal years 2006-2011.⁸ The services, recognizing the importance of ranges, have begun to implement various internal programs aimed at ensuring long-term range sustainment and the ability to meet both current and future requirements. In addition, OSD and the services have various systems to assess the condition of their ranges and are attempting to develop methods to reflect the readiness impacts caused by encroachment and other factors. Our recent work and the work of the DOD Inspector General⁹ have identified a variety of factors that have adversely affected training ranges in recent years including a lack of adequate funding, maintenance, and modernization for training ranges.

The Army Deputy Chief of Staff for Training is responsible for establishing range priorities and requirements and managing the Range and Training

⁷ Department of Defense, *Sustainable Range Action Plans* (Draft) (Washington, D.C.: Aug. 2001).

⁸ The memorandum identified seven areas (Infrastructure, Operations, Maintenance, Encroachment, Environmental Responsibilities, Outreach, and New Technologies) that the Under Secretary believes will significantly advance the department's efforts toward building viable range sustainment programs.

⁹ Department of Defense Inspector General, *Acquisition: Major Range and Test Facility Base*, D-2004-035 (Washington, D.C.: Dec. 8, 2003).

Land Program, which includes range modernization and maintenance, and land management through the Integrated Training Area Management Program. This office is creating and implementing the Sustainable Range Program to manage its ranges in a more comprehensive manner; meet the challenges brought on by encroachment; and maximize the capability, availability, and accessibility of its ranges. According to an official of the Office of the Army Deputy Chief of Staff for Training, the Sustainable Range Program will evolve into a new Army training range regulation that will replace the current Army Regulation 210-21, Range and Training Land Program, and Army Regulation 350-4, Integrated Training Area Management.¹⁰

On December 1, 2003, the Navy centralized its range management functions, to include training and testing ranges, target development and procurement, and test and evaluation facilities, into the Navy Range Office, Navy Ranges and Fleet Training Branch. The Navy Range Office integration will streamline processes, provide a single voice for range policy and management oversight, and provide a single resource sponsor. Recognizing the importance of Navy training ranges and to meet congressional reporting requirements, the Navy is developing a Navy Range Strategic Plan. The Navy plans to have this completed by June 2004. In addition, the Navy is working with the Center for Naval Analysis to develop a transferable analytical tool for systematic and rigorous range assessment. This tool is expected to integrate existing initiatives, such as the range complex management plans, the Navy mission essential tasks lists, and an encroachment log, into a methodology to identify, assess, and prioritize physical range resource deficiencies—to include those caused by encroachment issues—across ranges. An official of the Navy Range Office stated that the Navy plans to pilot the tool at the Southern California Complex¹¹ by November 2004.

In October 2001, the Marine Corps established an executive agent for range and training area management to implement its vision for mission-capable ranges. The Range and Training Area Management Division is

¹⁰ Army regulations, *Range and Training Land Program*, 210-21 (Washington, D.C.: May 1, 1997), and *Integrated Training Area Management*, 350-4 (Washington, D.C.: May 8, 1998).

¹¹ The Southern California complex comprises nine instrumented areas and many associated training, warning, restricted, and operations areas in three major components: the San Clemente Island Range Complex, Naval Amphibious Base Coronado training areas, and offshore operating areas and airspace.

located within the Training and Education Command. These offices are charged with developing systems, operational doctrine, and training requirements for Marine Corps forces. In addition to its own ranges, the Marine Corps engages in extensive cross-service utilization by depending on extensive and extended access to non-Marine Corps training ranges.

The Air Force's Director of Operations and Training, Ranges and Airspace Division acts as the executive agent for range management for the Air Force. The associate director for ranges and airspace stated that Air Force range issues have become much more sensitive due to a number of recent events, including the Navy's departure from Vieques, Puerto Rico; controversy with the Mountain Home Range, Idaho; the loss of naval ranges in Hawaii; and the push to redesign the national air space. As a result, Air Force leadership has become more aware of range needs. The Air Force has an integrated approach to range management, to include range planning, operations, construction, and maintenance. Air Force Range Planning and Operations Instruction¹² is the primary document governing Air Force planning as it relates to its ranges. In addition, the Air Force, using RAND, has conducted two studies addressing its training requirements and training range capacities, capabilities, and constraints.¹³ In general, the studies found that the Air Force's training ranges did not always meet the services' training requirements. For example, one study found that the distance between Air Force training ranges and bases exceeded the established flying limitation for 19 percent of the total air-to-ground training requirements for fighter jets.

OSD's Prior Legislative Proposals

In 2002, the department prepared and submitted to the Congress a package of legislative proposals to modify or clarify existing environmental legislation to address encroachment issues. The proposals, known as the Readiness and Range Preservation Initiative, were tailored to protect military readiness activities, not the entire scope of DOD activities.¹⁴ The proposals sought, among other things, to clarify provisions of the

¹² Air Force Instruction, *Range Planning and Operations*, 13-212 (Washington, D.C.: Aug. 7, 2001).

¹³ RAND, *Relating Ranges and Airspace to Air Combat Command Missions and Training*, MR-1286-AF, and *A Decision Support System for Evaluating Ranges and Airspace*, MR-1286/1-AF (Langley Air Force Base, Va.: 2001).

¹⁴ Department of Defense, *Readiness and Range Preservation Initiative* (Washington, D.C.: Apr. 2002).

Endangered Species Act; Marine Mammal Protection Act; Clean Air Act; Solid Waste Disposal Act; Resource Conservation and Recovery Act; Comprehensive Environmental Restoration, Compensation, and Liability Act; and the Migratory Bird Treaty Act.

The Bob Stump National Defense Authorization Act for Fiscal Year 2003 enacted three provisions, including two that allow DOD to cooperate more effectively with third parties on land transfers for conservation purposes, and a third that provides a temporary exemption from the Migratory Bird Treaty Act for the unintentional taking of migratory birds during military readiness activities. In March 2003, the department submitted five provisions to the Congress; the National Defense Authorization Act for Fiscal Year 2004 enacted two provisions including a clarification of “harassment” under the Marine Mammal Protection Act and allowing approved Integrated Natural Resource Management Plans to substitute for critical habitat designation under the Endangered Species Act. DOD submitted proposed legislation to the Congress on April 6, 2004, in a continuing effort to clarify provisions of the Clean Air Act; Comprehensive Environmental Response, Compensation, and Liability Act; and the Resource Conservation and Recovery Act.

Prior GAO Reports and Testimonies

In 2002, we issued two reports on the effects of encroachment on military training and readiness. In April 2002, we reported that troops stationed outside of the continental United States face a variety of training constraints that have increased over the last decade and are likely to increase further.¹⁵ In June 2002, we reported on the impact of encroachment on military training ranges inside the United States and had similar findings to our earlier report.¹⁶ We reported that many encroachment issues resulted from or were exacerbated by population growth and urbanization. DOD was particularly affected because urban growth near 80 percent of its installations exceeded the national average. In both reports, we stated that impacts on readiness were not well documented. In our June 2002 report, we recommended that (1) the services develop and maintain inventories of their training ranges, capacities, and capabilities, and fully quantify their training requirements considering complementary approaches to training; (2) OSD create a DOD

¹⁵ U.S. General Accounting Office, *Military Training: Limitations Exist Overseas but Are Not Reflected in Readiness Reporting*, [GAO-02-525](#) (Washington, D.C.: Apr. 30, 2002).

¹⁶ [GAO-02-614](#).

database that identifies all ranges available to the department and what they offer, regardless of service ownership, so that commanders can schedule the best available resources to provide required training; (3) OSD finalize a comprehensive plan for administrative actions that includes goals, timelines, projected costs, and a clear assignment of responsibilities for managing and coordinating the department's efforts to address encroachment issues on military training ranges; and (4) OSD develop a reporting system for range sustainability issues that will allow for the elevation of critical training problems and progress in addressing them to the Senior Readiness Oversight Council for inclusion in Quarterly Readiness Reports to the Congress as appropriate. In addition, we testified twice on these issues—in May 2002 and April 2003.¹⁷ In September 2003, we also reported that through increased cooperation DOD and other federal land managers could share the responsibility for managing endangered species.¹⁸

In March 2004, we issued a guide to help managers assess how agencies plan, design, implement, and evaluate effective training and development programs that contribute to improved organizational performance and enhanced employee skills and competencies.¹⁹ The framework outlined in this guide summarizes attributes of effective training and development programs and presents related questions concerning the components of the training and development process. Over time, assessments of training and development programs using this framework can further identify and highlight emerging and best practices, provide opportunities to enhance coordination and increase efficiency, and help develop more credible information on the level of investment and the results achieved across the federal government.

¹⁷ U.S. General Accounting Office, *Military Training: DOD Lacks a Comprehensive Plan to Manage Encroachment on Training Ranges*, [GAO-02-727T](#) (Washington, D.C.: May 16, 2002); and *Military Training: DOD Approach to Managing Encroachment on Training Ranges Still Evolving*, [GAO-03-621T](#) (Washington, D.C.: Apr. 2, 2003).

¹⁸ U.S. General Accounting Office, *Military Training: Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges*, [GAO-03-976](#) (Washington, D.C.: Sept. 29, 2003).

¹⁹ U.S. General Accounting Office, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

OSD's Training Range Inventory Does Not Yet Contain Sufficient Information to Use as a Baseline for a Comprehensive Plan

OSD's training range inventory does not yet contain sufficient information to use as a baseline for developing a comprehensive training range plan. As a result, OSD's report does not include a comprehensive plan to address training constraints caused by limitations on the use of military lands, marine areas, and airspace in the United States and overseas, as required by section 366. Without a comprehensive plan that identifies quantifiable goals or milestones for tracking planned actions and measuring progress, or projected funding requirements, it will be difficult for OSD to comply with the legislative requirement to report annually on its progress in implementing the plan.

OSD's Training Range Inventory Does Not Contain Sufficient Information

OSD's training range inventory, which is a compilation of the individual services' inventories, does not contain sufficient information to provide a baseline for developing a comprehensive training range sustainment plan. Section 366 requires the Secretary of Defense to develop and maintain an inventory that identifies all available operational training ranges, all training range capacities and capabilities, and any training constraints at each training range. Although OSD's inventory lists the services' training ranges as of November 2003 and identifies capabilities, the inventory does not identify specific range capacities or existing training constraints caused by encroachment or other factors, such as a lack of adequate maintenance or modernization. Nevertheless, to date, this is the best attempt we have identified by the services to inventory their training ranges. In doing so, OSD and the services provided more descriptive examples of constraints than ever before but did not fully identify the actual impacts on training. Without such information, it is difficult to develop a meaningful plan to address training constraints caused by encroachment or other factors.

While OSD's inventory is a consolidated list of ranges and capabilities as of November 2003, OSD and the services' inventories are not integrated and accessibility is limited. Therefore, it is not a tool that commanders could use to identify range availability, regardless of service ownership, and schedule the best available resources to provide required training. In addition, OSD has no method to continuously maintain this inventory without additional requests for data, even though section 366 requires the Secretary of Defense to maintain and submit an updated inventory annually to the Congress. In 2001, RAND concluded that centralized repositories of information on Air Force ranges and airspace are limited,

with little provision for updating the data. RAND noted that a comprehensive database is a powerful tool for range and airspace managers that must be continuously maintained and updated.²⁰ In addition, a knowledgeable official of the Office of the Under Secretary of Defense for Personnel and Readiness stated that having a common management system to share current range information is needed to identify range availability, capabilities, capacities, and cumulative effects of encroachment on training readiness. This official also noted that it would take several years to develop such a system. However, OSD did not address this system in its report.

OSD's Training Range Report Does Not Include a Comprehensive Plan

Without an inventory that fully identifies available training resources, specific capacities and capabilities, and existing training constraints, it is difficult to frame a comprehensive training range plan to address constraints. As a result, OSD's report does not include a comprehensive plan to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training—as required by section 366. Such a plan was to include proposals to enhance training range capabilities and address shortfalls, goals, and milestones for tracking planned actions and measuring progress, projected funding requirements for implementing planned actions, and designation of OSD and service offices responsible for overseeing implementation of the plan. However, OSD's report does not contain quantifiable goals or milestones for tracking planned actions and measuring progress, or projected funding requirements, which are critical elements of a comprehensive plan. Rather than a comprehensive plan, OSD and service officials characterized the report as a status report of the services' efforts to address encroachment that also includes service proposals to enhance training range capabilities, as previously discussed in the background, and designates OSD and service offices responsible for overseeing implementation of a comprehensive training range plan. According to a knowledgeable official of the Office of the Under Secretary of Defense for Personnel and Readiness, by providing the Congress a report on the current status of the individual services' efforts to put management systems in place to address encroachment issues and ensure range sustainability, OSD believed it was meeting the mandated requirements.

²⁰ RAND MR-1286-AF.

A professional journal article on sustaining DOD ranges, published by knowledgeable defense officials in 2000, notes that there should be some form of a national range comprehensive plan that provides the current situation, establishes a vision with goals and objectives for the future, and defines the strategies to achieve them.²¹ The article states that only with such a comprehensive plan can sustainable ranges and synergy be achieved. In addition, the article notes that while this plan should be done at the department-level, “DOD’s bias will be to have the services do individual plans.” In fact, OSD and service officials told us during our review that OSD should not be responsible for framing a comprehensive training range plan because the services are responsible for training issues. Despite that view, OSD has recently issued a comprehensive strategic plan and associated implementation plan—which includes all of the above elements—for more broadly transforming DOD’s training.²²

OSD’s Training Range Report Does Not Fully Meet Other Requirements Mandated by Section 366

OSD’s *Implementation of the Department of Defense Training Range Comprehensive Plan* report, which is a consolidation of information provided by the services, does not fully meet other requirements mandated by section 366. Specifically, it does not (1) fully assess current and future training range requirements; (2) fully evaluate the adequacy of current DOD resources, including virtual and constructive assets, to meet current and future training range requirements; (3) identify recommendations for legislative or regulatory changes to address training constraints; or (4) contain plans to improve the readiness reporting system.

OSD’s Report Does Not Fully Assess Current and Future Training Range Requirements

OSD’s report does not fully assess current and future training range requirements. Instead, the report describes the services’ processes to develop, document, and execute current training and training range requirements. The services’ inputs, as required by OSD’s guidance, vary in their emphasis on individual areas of requested information. Only the Air Force’s submission to OSD’s report identifies specific annual training

²¹ Jesse O. Borthwick, Senior Environmental Scientist, Eglin Range, Fla., and Eric A. Beshore, PE, RA, Colonel USAF (Retired), Senior Program Manager, Science Applications International Corporation, “Sustaining DOD Ranges: A National Environmental Challenge,” *Federal Facilities Environmental Journal*, Summer 2000.

²² Department of Defense, Office of the Under Secretary for Personnel and Readiness, *Strategic Plan for Transforming DOD Training* (Washington, D.C.: Mar. 1, 2002); and *Department of Defense Training Transformation Implementation Plan* (Washington, D.C.: June 10, 2003).

requirements by type of aircraft, mission category, type of training activity, and unit. By identifying its training requirements, the Air Force is in a better position to evaluate the adequacy of resources to meet current and future training requirements. Without a complete assessment, OSD and the services cannot determine whether available training resources are able to meet current and future requirements.

OSD's Report Does Not Fully Evaluate the Adequacy of Current DOD Resources to Meet Current and Future Training Range Requirements

OSD's report does not fully evaluate the adequacy of current DOD resources to meet current and future training range requirements in the United States and overseas. The report does not compare training range requirements to existing resources—a primary method to evaluate the adequacy of current resources—in the United States and does not evaluate overseas training resources. Instead, OSD's report states that generally the services' ranges allow military forces to accomplish most of the current training missions. However, this conflicts with later statements in the report noting that encroachment limits the services' ability to meet current core and joint training requirements.²³ For example, OSD's report discusses an evaluation of the Air Force's ranges in the United States, and identifies shortfalls in the Air Force's range resources and constraints that affect operations. The evaluation shows that the distance between Air Force training ranges and bases exceeded the established flying limitation for 19 percent of the total air-to-ground training requirements for fighter jets. The report also notes that the Army has shortages of modernized or automated ranges and has a significant overage of older ranges that do not fully meet current training requirements, but the report does not identify where these shortages occur or explain how this determination was made. In addition, the report states that 28 of 35 Army range categories²⁴ have some or major deficiencies that do not meet Army standards, or impair or significantly impair mission performance. The report further notes the condition of Marine Corps ranges and provides a general rating of the ranges by installation but does not identify specific shortfalls in resources or evaluate the adequacy of current resources to meet future training range requirements. OSD's report also notes that simulation plays a role in military training, but does not address the relative impact or adequacy of

²³ This statement also conflicts with numerous congressional testimonies given by OSD and service officials in the past 3 years that identify instances where encroachment impacts training.

²⁴ The Army defines range categories by the type of training that can be accomplished on them.

simulated training to meet current and future training range requirements, or to what extent simulation may help minimize constraints affecting training ranges.

OSD's Report Does Not Identify Recommendations for Legislative or Regulatory Changes

While OSD's report does not include any recommendations for legislative or regulatory changes to address training constraints, DOD submitted proposed legislation to the Congress on April 6, 2004, in an effort to clarify the intent of the Clean Air Act; Comprehensive Environmental Response, Compensation, and Liability Act; and the Resource Conservation and Recovery Act. Without these clarifications, according to DOD officials, the department would continue to potentially face lawsuits that could force the services to curtail training activities. According to DOD, the clarifications are to (1) grant test ranges a 3-year extension from complying with the Clean Air Act requirement when new units or weapons systems are moved to a range and (2) exempt military munitions at training ranges from provisions of the Comprehensive Environmental Response, Compensation, and Liability Act and Resource Conservation and Recovery Act to avoid the classification of munitions as solid waste, which could required expensive cleanup activities.

OSD's Report Does Not Include Plans to Improve the Readiness Reporting System

OSD's report does not address the department's plans to improve the readiness reporting system, called the Global Status of Resources and Training System, as required by the mandate. According to a knowledgeable OSD official, the Global Status of Readiness and Training System is not the system to capture encroachment impacts that are long-term in nature, rather it addresses short-term issues. Instead, according to an OSD official, the department is working on a Defense Readiness Reporting System, which is expected to capture range availability as well as other factors that may constrain training. However, OSD did not address either system in its report.

Conclusions

While OSD's *Implementation of the Department of Defense Training Range Comprehensive Plan* report addresses some of the mandated requirements, it does not fulfill the requirement for an inventory identifying range capacities or training constraints caused by encroachment or other factors, such as a lack of adequate maintenance or modernization; a comprehensive training range plan to address encroachment on military training ranges; an adequate assessment of current and future training range requirements; a sufficient evaluation of the adequacy of current DOD resources, including virtual and constructive

assets, to meet current and future training range requirements; recommendations for legislative or regulatory changes to address training constraints; or plans to improve the readiness reporting system. Instead, the report provides the current status of the services' various sustainable range efforts in the United States. Currently, OSD's inventory consists of individual services' inputs as of November 2003, but it is not a tool that commanders could use to identify range availability, regardless of service ownership, and schedule the best available resources to provide required training. In addition, OSD apparently has no planned method to continuously maintain this inventory. Without an integrated training range inventory that could be continuously updated and available at all command levels, the services may not have knowledge of or access to the best available training resources. This inventory may also have a significant impact on the ability of the services to support joint training. Also, without such an inventory, it will be difficult for OSD and the services to develop a comprehensive plan to address these issues to ensure range sustainability to support current and future training range requirements. As a result, even though various services' initiatives are underway to better address encroachment or other factors and ensure sustainability of military training ranges for future use, OSD's training range report did not include a comprehensive plan to address training constraints in the United States and overseas—as required by section 366. Without a plan that includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements, OSD and the services may not be able to address the ever-growing issues associated with encroachment and measure the progress in addressing these issues. Similarly, OSD's training range report did not fully assess current and future training range requirements or fully evaluate the adequacy of current resources to meet these requirements. Without these types of analyses, OSD and the services will not be able to determine shortfalls in training resources to better allocate training resources and may continue to maintain ranges that are no longer needed to meet current training requirements. Finally, the report did not include any recommendations for legislative or regulatory changes to address training constraints or a plan to improve the readiness reporting system to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges. Without an inventory identifying range capacities or training constraints caused by encroachment or other factors or a comprehensive training range plan to address training constraints caused by limitations on the use training ranges, OSD and the services will continue to rely on incomplete information to support funding requests and legislative or regulatory changes to address these issues.

Recommendations for Executive Action

To serve as the baseline for the comprehensive training range plan required by section 366, we recommend that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness and the secretaries of the military services to jointly develop an integrated training range database that identifies available training resources, specific capacities and capabilities, and training constraints caused by limitations on the use of training ranges, which could be continuously updated and shared among the services at all command levels, regardless of service ownership.

To improve future reports, we also recommend that OSD provide a more complete report to the Congress to fully address the requirements specified in the section 366 mandate by (1) developing a comprehensive plan that includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements to more fully address identified training constraints, (2) assessing current and future training range requirements and evaluating the adequacy of current resources to meet these requirements, and (3) developing a readiness reporting system to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges.

Agency Comments and Our Evaluation

In commenting on a draft of this report, the Deputy Under Secretary of Defense for Readiness disagreed with our finding that OSD's training range report failed to address the congressional reporting requirements mandated in section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 and disagreed with three of our four recommendations. As it clearly points out, this report outlines numerous instances where OSD's report did not address congressionally mandated reporting requirements. Our recommendations were intended to help DOD address all requirements specified in section 366. Without their implementation, DOD will continue to rely on incomplete information to support funding requests and legislative or regulatory changes to address encroachment and other factors.

DOD disagreed with our first recommendation—to jointly develop an integrated training range database that identified available training resources, specific capacities and capabilities, and training constraints, which could be continuously updated and shared among all the services at all command levels regardless of service ownership. As discussed in our report, OSD's inventory consists of individual services' inputs as of November 2003 and is not a tool that commanders could use to identify range availability, regardless of service ownership, and schedule the best

available resources to provide required training. Further, as noted in our report, the individual service submissions continue to provide limited information on how training has been constrained by encroachment or other factors. In contrast, section 366 clearly requires the Secretary of Defense to develop and maintain an inventory that identifies all available operational training ranges, all training range capacities and capabilities, and any training constraints at each training range. DOD's suggestion that our draft report recommended that DOD should initiate a "massive new database" effort to allow OSD management of individual range activities is without merit. Our recommendation merely specified section 366 legislative requirements that were not found in OSD's training range report to the Congress.

Also, DOD's disagreement with our first recommendation seems inconsistent with other comments DOD officials have made as noted in this and other GAO reports regarding military training range inventories.²⁵ In commenting on this report, DOD specifically stated that it agreed that, as a long-term goal, the services' inventory systems should be linked to support joint use. In commenting on a prior report, DOD stated that the services were developing a statement of work in order to contract with a firm capable of delivering an enterprise level web-enabled system that will allow cross service, as well as intra-service training use of inventory data.²⁶ Further, in a 2003 study, the U.S. Special Operations Command stated that all components needed to create master range plans that addressed their current and future range issues and solutions.²⁷ The command also recommended that plans identify and validate training requirements and facilities available and define the acceptable limits of workarounds. Without an integrated training range inventory, we continue to believe that it will be difficult for OSD and the services to develop a comprehensive plan and track its progress in addressing training constraints and ensuring range sustainability.

DOD generally concurred with our second recommendation—to develop a comprehensive plan that includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding

²⁵ [GAO-02-525](#) and [GAO-02-614](#).

²⁶ [GAO-02-614](#).

²⁷ U.S. Special Operations Command, *Tiger Team Report: Global Special Operations Forces Range Study* (MacDill Air Force Base, Fla.: Jan. 27, 2003).

requirements to more fully address identified training constraints. However, the department's comments suggest it plans simply to summarize ongoing efforts of individual services rather than formulate a comprehensive strategy for addressing training constraints. Without a plan that includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements, OSD and the services may not be able to address the ever-growing issues associated with encroachment and other training constraints and measure the progress in addressing these issues. Also, a summary of ongoing efforts does not fully address the requirements of section 366, which calls for a comprehensive plan for using existing authorities available to the Secretaries of Defense and the military departments to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training. Second, it directly contradicts DOD's concurrence with recommendations made in our June 2002 report where we specifically recommended that the department develop a plan with the same elements subsequently required by the mandate.²⁸ Third, it contradicts a January 2003 report of the Southwest Region Range Sustainability Conference sponsored by the Deputy Under Secretary of Defense for Readiness and the Deputy Under Secretary of Defense for Installations and Environment.²⁹ The conference report recommended a national range sustainability and infrastructure plan—which could also address section 366 requirements—to include range requirements, overall vision, current and future requirements, and encroachment issues. Without a comprehensive plan that includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements, we continue to believe that OSD and the services may not be able to address the ever-growing issues associated with encroachment and other training constraints, and measure the progress in addressing these issues.

DOD disagreed with our third recommendation—to assess current and future training range requirements and evaluate the adequacy of current resources to meet these requirements. It stated that it is inappropriate and impractical to include this level of detail in an OSD-level report and that the Congress is better served if the department describes, summarizes, and

²⁸ [GAO-02-614](#).

²⁹ Department of Defense Region IX Regional Environmental Coordinator, *Southwest Region Range Sustainability Conference Report* (San Diego, Calif.: Jan. 7, 2003).

analyzes range requirements. Clearly, these statements are contradictory in that section 366 requires that OSD report on its assessment of current and future training range requirements and an evaluation of the adequacy of current DOD resources to meet current and future training requirements, which could be accomplished by providing the aforementioned description, summary, and analysis of range requirements. While the department's training range report provided a description of the methodology used by each service to develop their requirements, it did not provide any detail regarding such analyses. Without these types of analyses, we continue to believe that OSD and the services will not be able to determine shortfalls in training resources to better allocate training resources and may continue to maintain ranges that are no longer needed to meet current training requirements. In addition, the department questions why we did not examine detailed requirements work being done at each installation. While we agree with DOD that this type of examination could be useful, it is unclear why OSD's report did not provide a discussion of the work underway at individual installations. While we may conduct such an examination in the future, section 366 did not specifically require us to conduct this examination, nor did it provide us sufficient time for such an examination.

DOD disagreed with our fourth recommendation—to develop a readiness reporting system to reflect the impact on readiness caused by training constraints. DOD further stated that it was inappropriate to modify the Global Status of Readiness and Training System report to address encroachment and that it plans to incorporate encroachment impacts on readiness into the Defense Readiness Reporting System. Our draft report recognized that the department does not believe that the Global Status of Readiness and Training System is the system to capture encroachment impacts. Given that OSD's training range reports are required to provide a status of efforts to address training constraints, it is unclear why OSD's report did not provide an assessment of progress in this area. We continue to believe that future reports should provide the Congress with information on DOD's progress toward improving readiness reporting—whether it is the Defense Readiness Reporting System as cited in DOD's comments or another system—to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges, as required by section 366.

We continue to believe our recommendations are valid and without their implementation, DOD will continue to rely on incomplete information to support funding requests and legislative or regulatory proposals to address

encroachment and other training constraints, and will not be able to fully address the congressionally mandated requirements in section 366.

The Deputy Under Secretary's comments are included in appendix II.

Scope and Methodology

To determine the extent to which OSD's training range inventory contains sufficient information to develop a comprehensive training range plan, we reviewed OSD's inventory of the services' training ranges to determine whether the inventory identified training capacities and capabilities, and constraints caused by encroachment or other factors for each training range. In addition, we reviewed the services' inputs to OSD's inventory and OSD's report for a comprehensive training range plan.³⁰ We also discussed OSD's inventory and the services' inputs and the need for a comprehensive training range plan with officials from the Office of the Director of Readiness and Training, Office of the Under Secretary of Defense, Personnel and Readiness; and a representative of the contractor, who compiled the report. Also, we reviewed two RAND studies on Air Force ranges and airspace.

To determine the extent to which OSD's *Implementation of the Department of Defense Training Range Comprehensive Plan* report meets other requirements mandated by section 366, we reviewed the report to determine if it contained an assessment of current and future training range requirements; an evaluation of the adequacy of current DOD resources, including virtual and constructive assets, to meet current and future training range requirements; recommendations for legislative or regulatory changes to address training constraints; and plans to improve the readiness reporting system. To obtain further clarification and information, we reviewed the individual submissions from the Army, Navy, Marine Corps, and Air Force. We also discussed OSD's report and the services' inputs with officials from the Office of the Director of Readiness and Training, Office of the Under Secretary of Defense, Personnel and Readiness; the Office of the Director, Training Directorate, Training Simulations Division, Office of the Deputy Chief of Staff, Department of the Army; the Navy Ranges and Fleet Training Branch, Fleet Readiness Division, Fleet Readiness and Logistics, Office of the Deputy Chief of Naval Operations; the Range and Training Area Management Division,

³⁰ We did not verify the completeness or accuracy of OSD's inventory or the services' inventory inputs.

Training and Education Command, Headquarters, Marine Corps; and the Office of the Director of Ranges and Airspace, Air and Space Operations, Headquarters, Air Force. We also met with a representative of the contractor who compiled the report. To determine what guidance the services were given when preparing their submission to the department's report, we also reviewed the January 28, 2003, memorandum from the Under Secretary of Defense for Personnel and Readiness to the military services.³¹ We also reviewed DOD's Sustainment of Ranges and Operating Areas directive³² that establishes policy and assigns responsibilities for the sustainment of test and training ranges and the department's Strategic Plan for Transforming DOD Training and Training Transformation Implementation Plan.³³

We assessed the reliability of the data in OSD's report by (1) reviewing existing information about military training ranges, (2) interviewing OSD and service officials knowledgeable about the report and training ranges, and (3) examining the data elements in the report by comparing known statistics and information. We determined that the data were sufficiently reliable for the purposes of this report.

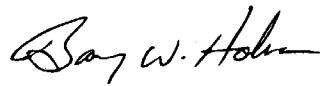
We are sending copies of this report to the appropriate congressional committees, as well as the Secretaries of Defense, the Army, the Navy, and the Air Force, and the Director, Office of Management and Budget. We will also make copies available to others upon request. In addition, the report will be available at no charge on GAO's Web site at <http://www.gao.gov>.

³¹ Department of Defense, Under Secretary of Defense for Personnel and Readiness, *Guidance for Complying with the Provisions of Section 366*.

³² Department of Defense Directive. *Sustainment of Ranges and Operating Areas*, 3200.15 (Washington, D.C.: Apr. 2003).

³³ DOD, Strategic and Implementation Plans for Training Transformation.

If you or your staff have any questions on the matters discussed in this letter, please contact me at (202) 512-8412, or my Assistant Director, Mark A. Little, at (202) 512-4673. Patricia J. Nichol, Tommy Baril, Steve Boyles, and Ann DuBois were major contributors to this report.



Barry W. Holman, Director
Defense Capabilities and Management

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Appendix I: Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003

SEC. 366. Training Range Sustainment Plan, Global Status of Resources and Training System, and Training Range Inventory.

(a) PLAN REQUIRED—(1) The Secretary of Defense shall develop a comprehensive plan for using existing authorities available to the Secretary of Defense and the Secretaries of the military departments to address training constraints caused by limitations on the use of military lands, marine areas, and airspace that are available in the United States and overseas for training of the Armed Forces.

(2) As part of the preparation of the plan, the Secretary of Defense shall conduct the following:

(A) An assessment of current and future training range requirements of the Armed Forces.

(B) An evaluation of the adequacy of current Department of Defense resources (including virtual and constructive training assets as well as military lands, marine areas, and airspace available in the United States and overseas) to meet those current and future training range requirements.

(3) The plan shall include the following:

(A) Proposals to enhance training range capabilities and address any shortfalls in current Department of Defense resources identified pursuant to the assessment and evaluation conducted under paragraph (2).

(B) Goals and milestones for tracking planned actions and measuring progress.

(C) Projected funding requirements for implementing planned actions.

(D) Designation of an office in the Office of the Secretary of Defense and in each of the military departments that will have lead responsibility for overseeing implementation of the plan.

(4) At the same time as the President submits to Congress the budget for fiscal year 2004, the Secretary of Defense shall submit to Congress a report describing the progress made in implementing this subsection, including—

(A) the plan developed under paragraph (1);

(B) the results of the assessment and evaluation conducted under paragraph (2); and

(C) any recommendations that the Secretary may have for legislative or regulatory changes to address training constraints identified pursuant to this section.

(5) At the same time as the President submits to Congress the budget for each of fiscal years 2005 through 2008, the Secretary shall submit to Congress a report describing the progress made in implementing the plan and any additional actions taken, or to be taken, to address training constraints caused by limitations on the use of military lands, marine areas, and airspace.

(b) **READINESS REPORTING IMPROVEMENT**—Not later than June 30, 2003, the Secretary of Defense, using existing measures within the authority of the Secretary, shall submit to Congress a report on the plans of the Department of Defense to improve the Global Status of Resources and Training System to reflect the readiness impact that training constraints caused by limitations on the use of military lands, marine areas, and airspace have on specific units of the Armed Forces.

(c) **TRAINING RANGE INVENTORY**—(1) The Secretary of Defense shall develop and maintain a training range inventory for each of the Armed Forces—

(A) to identify all available operational training ranges;

(B) to identify all training capacities and capabilities available at each training range; and

(C) to identify training constraints caused by limitations on the use of military lands, marine areas, and airspace at each training range.

(2) The Secretary of Defense shall submit an initial inventory to Congress at the same time as the President submits the budget for fiscal year 2004 and shall submit an updated inventory to Congress at the same time as the President submits the budget for fiscal years 2005 through 2008.

(d) GAO EVALUATION—The Secretary of Defense shall transmit copies of each report required by subsections (a) and (b) to the Comptroller General. Within 60 days after receiving a report, the Comptroller General shall submit to Congress an evaluation of the report.

(e) ARMED FORCES DEFINED—In this section, the term ‘Armed Forces’ means the Army, Navy, Air Force, and Marine Corps.

Appendix II: Comments from the Department of Defense



PERSONNEL AND
READINESS

OFFICE OF THE UNDER SECRETARY OF DEFENSE
4000 DEFENSE PENTAGON
WASHINGTON, D.C. 20301-4000

MAY 20 2004

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

Dear Mr. Holman: *Barry*

This is the Department of Defense (DoD) response to the General Accounting Office Draft Report GAO-04-608, "MILITARY TRAINING: OSD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements," April 19, 2004 (GAO Code 350481).

The Department appreciates the opportunity to comment on this draft. We disagree with the GAO's findings that our February 2004 report to Congress fails to satisfy stated requirements. DoD therefore non-concurs with the GAO's recommendations in this area. The Department's comments to the GAO draft recommendations are enclosed.

Sincerely,

Paul W. Mayberry
Deputy Under Secretary
Readiness

Enclosure:
As stated



GAO-04-608/GAO CODE 350481

**“MILITARY TRAINING: DOD REPORT ON TRAINING
RANGES DOES NOT FULLY MEET CONGRESSIONAL
REPORTING REQUIREMENTS”**

**DEPARTMENT OF DEFENSE COMMENTS
TO THE RECOMMENDATIONS**

RECOMMENDATION 1: The GAO recommended that the Secretary of Defense direct the Under Secretary of Defense for Personnel and Readiness and the Secretaries of the Military Services to jointly develop an integrated training range database that identifies available training resources, specific capacities and capabilities, and training constraints caused by limitations on the use of training ranges, which could be continuously updated and shared among the Services at all command levels, regardless of Service ownership. (Page 18/Draft Report)

DoD RESPONSE: Non-concur. Each Military Service already possesses and is improving range information systems that address the features described in this recommendation. Further, the Department agrees that, as a long-term goal these systems should be linked to support joint use. It is DoD policy to document encroachment concerns and environmental considerations and improve information systems related to range management. The Services and OSD are moving forward in a deliberate approach that builds on existing systems and carefully manages the costs and risks inherent in information system integration and development. As part of our yearly Section 366 reports, the Department will document progress in this evolutionary effort to link and improve the Service range information systems.

However, the Department non-concurs with the recommendation that it should initiate a new massive database effort to allow OSD management of individual range activities. It must be recognized that each Service operates ranges to meet specific training requirements. While increased cross-Service or cross-functional use is a DoD goal, it does not resolve training constraints brought about by encroachment.

RECOMMENDATION 2: The GAO recommended that OSD provide a more complete report to the Congress to fully address the requirements specified in the Section 366 mandate by developing a comprehensive plan, which includes quantifiable goals and milestones for tracking planned actions and measuring progress, and projected funding requirements to more fully address identified training constraints. (Page 18/Draft Report)

DoD RESPONSE: Concur with comment. Meeting Section 366 requirements can be accomplished only through a long-term approach. Under OSD leadership, each of the Military Services has initiated an enhanced range management and comprehensive

planning process, as an integral element of expanding range sustainability programs. In line with this evolution, future reports will more fully address goals and milestones and projected funding requirements associated with these comprehensive plans. The Department is and will continue to execute a comprehensive program to improve sustainability of its ranges, and disagrees with the implication in this recommendation that it does not.

RECOMMENDATION 3: The GAO recommended that OSD provide a more complete report to the Congress to fully address the requirements specified in the Section 366 mandate by assessing current and future training range requirements and evaluating the adequacy of current resources to meet these requirements. (Page 18/Draft Report)

DoD RESPONSE: Non-concur. The Department has begun a program to better define range requirements. Because a valid requirements base must be a bottom-up process, this effort entails detailed work at each installation. It is unclear why GAO chose to not examine these efforts. Also, it is both impractical and inappropriate to include this level of detail in an OSD-level report. DoD believes that the Congress is better served if the Department describes, summarizes, and analyzes training requirements in its Section 366 reporting, rather than simply providing the requirements themselves. DoD therefore non-concurs with the GAO finding that it is not appropriately addressing this recommendation.

RECOMMENDATION 4: The GAO recommended that OSD provide a more complete report to the Congress to fully address the requirements specified in the Section 366 mandate by developing a readiness reporting system to reflect the impact on readiness caused by training constraints due to limitations on the use of training ranges. (Page 18/Draft Report)

DoD RESPONSE: Non-concur. The Department has, in its response to GAO's previous report and at other opportunities, stated that it is inappropriate to modify the SORTS report to address encroachment. DoD believes it is best to assess how encroachment impacts affect the ability of installations and ranges to conduct training and testing. DoD plans to incorporate encroachment impacts on readiness into the Defense Readiness Reporting System (DRRS), which is currently under development.

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