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GAO

Report to Congressional Requesters

September 2003

MILITARY TRAINING

Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges

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GAO-03-976

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Highlights

Highlights of GAO-03-976, a report to congressional requesters

Why GAO Did This Study

Military lands provide habitat for more than 300 species that must be protected under the Endangered Species Act and many other species that may become endangered. In some cases, military installations provide some of the finest remaining habitat for these species. However, Department of Defense (DOD) officials stated that protection of endangered species may result in land-use restrictions that reduce the military's flexibility to use land for training. GAO was asked to examine the (1) extent to which DOD and other nearby federal land managers in the region are managing cooperatively for endangered species affecting military training ranges and (2) factors that can limit cooperative management for endangered species on military training ranges.

What GAO Recommends

GAO recommends that the Secretaries of Defense, the Interior, and Agriculture develop and implement an interagency strategy, a comprehensive training program, and a centralized data source for cooperative management efforts. The Departments of Defense, the Interior, and Agriculture concurred on the need to improve interagency cooperation. GAO also proposes that Congress consider requiring the agencies to jointly report annually on their efforts to manage cooperatively for endangered species affecting military training ranges.

www.gao.gov/cgi-bin/getrpt?GAO-03-976.

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.

What GAO Found

DOD and other federal land managers have taken some steps to implement interagency cooperative efforts to manage endangered species on a regional basis, but the extent to which they are using this approach for military training ranges is limited. Federal land managers recognize that cooperative management of endangered species has several benefits, such as sharing land-use restrictions and resources and providing better protection for species in some cases. The Departments of the Interior and Agriculture have issued policies, and DOD has issued directives to promote cooperative management of natural resources. They have also outlined specific actions to be taken—such as identifying geographic regions for species management and forming working groups. However, follow-through on these actions has been limited, without many of the prescribed actions being implemented. A few cooperative management efforts have been taken but were generally in response to a crisis—such as a species' population declining.

The Departments of Defense, the Interior, and Agriculture have identified a number of factors that can limit cooperative management for endangered species on military training ranges. When a species is found on training ranges but is not found on other federal land or is not protected under the Endangered Species Act, neighboring land managers do not always consider management of the species a high priority. Limited interaction among agencies and limited resources to employ cooperative programs also inhibit cooperative management. Lack of training and expertise has limited federal land managers' ability to identify such opportunities. Moreover, federal agencies cannot easily share information—such as best practices and land management plans—because there is no centralized source of such information. Given that federal agencies have made little progress in implementing the various agreements for cooperative management, an interagency reporting requirement would provide a basis to hold agencies accountable for sharing endangered species management on training ranges.

Source: Departments of the Air Force (left) and the Army (right).

Numerous factors contribute to the cooperative management of species among neighboring federal land managers. The endangered Sonoran pronghorn (left) is being managed cooperatively between DOD and other federal land managers in Arizona, while DOD is managing the western sage grouse, a candidate species, (right) in Washington State on its own initiative.

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United States General Accounting Office
Washington, DC 20548

September 29, 2003

The Honorable Tom Davis
Chairman, Committee on Government Reform
House of Representatives

The Honorable Christopher Shays
Chairman, Subcommittee on National Security,
Emerging Threats and International Relations
Committee on Government Reform
House of Representatives

Military lands provide habitat for more than 300 federally listed species that must be protected under the Endangered Species Act and many other species that may become endangered.[1] The Endangered Species Act of 1973 provides a means whereby the ecosystems upon which endangered species depend are conserved. Under the act, all federal departments and agencies shall seek to conserve endangered species and shall utilize their authorities in furtherance of this purpose. The Department of Defense (DOD) and other agency officials have testified that some of the finest remaining examples of rare wildlife habitats for these species exist on military installations. However, DOD officials have stated that protection of endangered species may result in land-use restrictions that reduce the military's flexibility to use designated lands for training, a restriction that can put military missions in jeopardy. Likewise, senior DOD and military service officials have testified before Congress that they face increasing difficulty in carrying out realistic training at military installations and have identified endangered species as one of eight "encroachment" issues[2] that affect or have the potential to affect military training and readiness. In an effort to address these encroachment issues, DOD drafted a sustainable range action plan for each of the encroachment issues in 2001. The draft

[1] The Endangered Species Act requires the Secretary of the Interior or the Secretary of Commerce to publish lists of all species determined to be threatened or endangered. See 16 U.S.C. § 1533(c).

[2] The eight encroachment issues are: endangered species habitat on military installations, unexploded ordnance and munitions constituents, competition for radio frequency spectrum, protected marine resources, competition for airspace, air pollution, noise pollution, and urban growth around military installations.

Endangered Species Act Sustainable Range Action Plan[3] suggests that the Office of the Secretary of Defense and the military services should build new and expand upon existing partnerships with other federal land managers in an effort to manage for endangered species on a regional basis as a way to accommodate military training and operations as well as meet the legal requirements for endangered species protection and conservation.

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.[4] In June 2002, we reported on the impact of encroachment on military training ranges[5] inside the United States and had similar findings to our earlier report.[6] 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. We also testified twice on these issues—in May 2002 and April 2003.[7]

At your request, we examined the (1) extent to which DOD and other nearby federal land managers[8] are managing cooperatively on a regional

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

[4] 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).

[5] We use the term "training ranges" to collectively refer to air ranges, live-fire ranges, ground maneuver ranges, and sea ranges.

[6] 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).

[7] U.S. General Accounting Office, *Military Training: DOD Needs 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).

[8] For the purposes of this report, other federal land managers include the U.S. Fish and Wildlife Service National Wildlife Refuge System, Bureau of Land Management, National Park Service, and Forest Service. We selected those for this review because they are the largest federal land managers in addition to DOD.

interagency basis for endangered species affecting military training ranges and (2) factors that can limit interagency cooperative management for endangered species affecting military training ranges. In conducting our work, we interviewed headquarters and field office personnel for the major land management departments—the Departments of Defense, the Interior, and Agriculture—to obtain information related to policies, directives, procedures, interagency agreements, and practices that advocate or promote cooperative management of natural resources and, more specifically, endangered species. We also visited three military installations and two major commands, and toured three training ranges—Yakima Training Center, Washington; Fort Lewis, Washington; and the Barry M. Goldwater Training Range, Arizona. In addition, we met with other federal land managers near the Yakima Training Center and Barry M. Goldwater Training Range. We also visited several nongovernmental organizations near the training ranges at the Yakima Training Center, the Barry M. Goldwater Training Range, and elsewhere to obtain their observations on interagency cooperative management and factors that limit their participation. A more thorough description of our scope and methodology is provided in appendix I. This report focuses exclusively on issues concerning species that must be protected under the Endangered Species Act and many other species that may become endangered affecting military training ranges inside the United States.

We conducted our work from September 2002 through September 2003 in accordance with generally accepted government auditing standards.

Results in Brief

Although DOD and federal land managers over time have taken some steps to implement interagency cooperative efforts to manage endangered species on a regional basis, the extent to which this approach is used for military training ranges is limited. DOD and other federal land managers recognize that cooperative management of endangered species has several benefits, such as sharing land-use restrictions and limited resources and providing better protection for species in some cases. The Departments of the Interior and Agriculture have issued policies, and DOD has issued directives, instructions, and an action plan to promote cooperative management of natural resources. They have also entered into memorandums of understanding that contain specific actions to be taken to implement cooperative management, such as forming interagency working groups, identifying geographic regions for species management, and reporting on progress. However, follow-through on these steps has been limited. For example, in 1994, 14 federal agencies signed a memorandum of understanding in support of cooperative management

to implement the Endangered Species Act in response to legislative proposals that at the time could have reduced the scope and authority of the act. However, according to a DOD official, once the legislative proposals failed, management support for the memorandum was reduced, and it expired without many of the prescribed actions being implemented. A few cooperative management efforts have been taken but were generally in response to a crisis, such as a species' population dramatically declining. For example, at the Barry M. Goldwater Training Range, military services and other land managers have worked together to manage the Sonoran pronghorn—an endangered species that has significantly declined.

Officials of the Departments of Defense, the Interior, and Agriculture identified numerous factors that can limit regional interagency cooperative management for endangered species affecting military training ranges, ranging from those instances when there is not a shared crisis among federal land managers to the current lack of centralized or otherwise easily accessible information on cooperative management efforts. More specifically, federal land managers may not consider cooperative management efforts a high priority when a species does not exist on their land or is not federally listed as an endangered species and therefore may not participate in such efforts. At the Yakima Training Center, the Army is managing for the western sage grouse in an attempt to prevent the species from being federally listed, an action that could result in land-use restrictions at the center. The Army's efforts to work with other federal land managers have been largely unsuccessful because the sage grouse is not listed by the federal government and populates only the center's training range and not other nearby federal lands. Another factor is limited agency interaction. Federal agency officials said that this has resulted in a lack of a single vision, mistrust, and a misunderstanding about each other's land-use responsibilities. An additional factor, according to agency officials, is limited resources. DOD and other federal land managers stated that they have to finance interagency cooperative management efforts from already limited funds. Federal agency officials also identified a lack of training and experience as factors that limit interagency cooperative management. For instance, a lack of cooperative management training has limited federal land managers' ability to identify opportunities for cooperative management as well as the neighboring land managers needed to implement them. Furthermore, federal land managers lack a centralized or otherwise easily accessible source of information on cooperative management efforts. As a result, officials said that they are unable to easily share information and learn about cooperative management efforts within and across agencies. While

officials of the Departments of Defense, the Interior, and Agriculture have identified these factors as limiting their ability to manage cooperatively, they have not developed a comprehensive strategy to address these factors and increase the use of regional interagency cooperative management. Such a strategy could include a systematic methodology to identify opportunities to participate in cooperative management efforts, funding sources, science and technology sources, and goals and criteria to measure success. Also, considering that federal agencies have made little progress in implementing the various agreements to undertake cooperative management, an interagency reporting requirement to Congress would provide a basis to improve agency accountability for implementation of interagency cooperative management for endangered species affecting military training ranges.

To encourage cooperative management for endangered species affecting military training ranges, this report recommends that the Secretaries of Defense, the Interior, and Agriculture jointly develop and implement an interagency strategy, a comprehensive training program, and a centralized or otherwise easily accessible source of information for cooperative management efforts. To hold DOD and other federal land managers accountable for implementing regional interagency cooperative efforts, this report also suggests that Congress may wish to consider requiring that the Secretaries of Defense, the Interior, and Agriculture jointly report each year on their efforts to manage cooperatively for endangered species affecting military training ranges. In commenting on a draft of the report, the Departments of Defense, the Interior, and Agriculture concurred on the need to improve interagency cooperation in managing for endangered species.

Background

DOD and other federal land management agencies—including the Departments of the Interior and Agriculture—manage millions of acres of land that provide habitat for hundreds of endangered species. Each of these federal agencies have specific land-use responsibilities that have to be executed while at the same time conserving the existing natural resources and complying with the Endangered Species Act. DOD uses its lands primarily to train military forces and test weapon systems. In doing so, DOD operates on training ranges that vary in size from a few acres to more than a million acres. The Department of the Interior's Bureau of Land Management manages about 264 million acres of public land for a variety of resources and uses including minerals, timber, forage, and fish and wildlife habitat; Interior's National Park Service mission is the conservation of the scenery and the natural and historic objects and

wildlife in the parks in order to leave them unimpaired for future generations; Interior's National Wildlife Refuge System mission is to administer lands and waters for the conservation, management, and restoration of fish, wildlife, and their habitat; and the Department of Agriculture's Forest Service manages about 192 million acres of national forest and grasslands for a variety of resources and uses including timber, forage, recreation, and fish and wildlife habitat.

The Endangered Species Act

In 1973, Congress enacted the Endangered Species Act to protect plant and animal species whose survival is in jeopardy. The act requires that the Secretary of the Interior and the Secretary of Commerce publish lists of all species determined to be endangered or threatened.[9] A species is defined as endangered when it is in danger of extinction throughout all or a significant part of its range and as threatened when it is likely to become endangered throughout all or a significant portion of its range in the foreseeable future.

Concurrent with listing a species, the Secretary of the Interior or the Secretary of Commerce must, to the maximum extent prudent and determinable, designate "critical habitat" for the species.[10] Critical habitat is defined as the specific areas that are essential for the conservation of the species and, for areas occupied by the species, may require special management considerations or protection. Species that are federally listed are entitled to certain protections under the Endangered Species Act. Specifically, the taking[11] of a listed animal species without a permit from the Secretary is prohibited. Further, under the act, each federal agency, in consultation with the Secretary, is required to ensure that its actions are not likely to jeopardize the continued existence of protected species or adversely modify habitat critical to their survival.

Defense and Interior officials have stated that in managing endangered species affecting training ranges, DOD's past successful efforts have

[9] The Secretary of the Interior, through the U.S. Fish and Wildlife Service, is responsible for implementing the act for most freshwater and land species. The Secretary of Commerce, through the National Marine Fisheries Service, is responsible for most saltwater species.

[10] The Secretary may exclude an area from critical habitat if he or she determines that the benefits of excluding an area outweigh the benefits of specifying the area.

[11] Take means to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect a listed species. See 16 U.S.C. § 1538(a)(1)(B).

resulted in the ranges becoming havens for at-risk species after rapid urban growth destroyed habitat, leaving military lands as the last refuge for many species. DOD officials believe that balancing endangered species management with mission needs can sometimes be problematic.[12] For example, at the Barry M. Goldwater Training Range, Air Force officials report that in 2001, 32 percent of their live-fire missions were either cancelled or moved due to the presence of the endangered Sonoran pronghorn. Also, a recent Marine Corps report stated that at Camp Pendleton, California, compliance with the Endangered Species Act is the leading encroachment factor impacting military training and operations.[13] The report noted that the Marine Corps is only able to complete up to 68 percent of the service's readiness standard for an advanced tactical training scenario and its participation in realistic training has been significantly degraded due to endangered species and other forms of encroachment.[14]

The Sikes Act

Since 1960, the Sikes Act has required military installations to provide for the conservation and rehabilitation of natural resources on their lands. In 1997, the Sikes Act was amended to require that the military services prepare integrated natural resources management plans in cooperation with the U.S. Fish and Wildlife Service and the appropriate state agencies and established a timeframe for the completion of all plans. The plans are expected to balance the management of natural resources with mission requirements and other land-use activities affecting those resources and should reflect the mutual agreement of the parties concerning management of fish and wildlife resources.

DOD and U.S. Fish and Wildlife Service officials believe that DOD's integrated natural resources management plans provide a holistic approach for natural resources management and for installations where an

[12] The Endangered Species Act provides that an agency may apply to the Endangered Species Committee for an exemption from the act's requirements for an agency action. The act provides that the committee must grant an exemption for an agency action if the Secretary of Defense finds the exemption is necessary for reasons of national security. However, according to a Congressional Research Service report, DOD has never sought an exemption under the Endangered Species Act.

[13] SRS Technologies, *Encroachment Impacts on Training and Readiness at Marine Corps Base Camp Pendleton*, (a special report prepared for Marine Corps Base Camp Pendleton, Calif.: Mar. 2003).

[14] At the same time, our prior work in this area found that negative results of training limitations are rarely reflected in official unit readiness reports.

approved natural resources management plan is in place, the plan should be used as a substitute for critical habitat designations. For several years, the U.S. Fish and Wildlife Service has been using these management plans in lieu of designating critical habitat on military lands. In testimonies in March and April 2003, Interior Department officials said that a recent lawsuit that successfully challenged U.S. Fish and Wildlife Service's failure to designate critical habitat casts doubt on the service's ability to substitute critical habitat designations on military lands with approved natural resources management plans. In that lawsuit, which involved a Forest Service plan, the court ruled that the U.S. Fish and Wildlife Service was incorrect in its interpretation that land may be excluded from critical habitat designation under the Endangered Species Act when management or protection of the area is already in place.[15] In DOD's recent legislative proposal—Readiness and Range Preservation Initiative for Fiscal Year 2004—it is requesting that Congress confirm an existing practice that, according to DOD, may make the designation of critical habitat on military lands unnecessary when an approved integrated natural resources management plan is in place.[16] DOD and other federal and state agencies as well as some nongovernmental organizations view this initiative as providing a crucial balance between the stewardship of its lands and the ability for the military to train for combat missions. Some public interest groups, however, are concerned that needed species' protections would be compromised by such an approach.

Prior GAO Reports

In 2002, we issued two reports on the effects of encroachment on military training and readiness. The findings of the two reviews have some similarities. 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.[17] While these constraints can have a variety of adverse impacts, including adjustment or cancellation of training events, we found that these impacts largely have not been captured in DOD's readiness reporting.[18] In

[15] *Center for Biological Diversity v. Norton*, 240 F. Supp. 2d 1090 (D. Ariz. 2003).

[16] Department of Defense, *Readiness and Range Preservation Initiative for Fiscal Year 2004*, submitted to Congress in Feb. 2003.

[17] GAO-02-525.

[18] While service readiness data in 2002 did not show the impact of encroachment on training readiness or costs, DOD's most recent quarterly report to the Congress on readiness did tie a training issue directly to encroachment.

June 2002, we reported on the impact of encroachment on military training ranges inside the United States.[19] We found that, over time, the military services have increasingly lost training range capability owing to encroachment, such as urban growth and competition for airspace, and that encroachment issues limit a unit's ability to train as it would be expected to fight or would require adjustments to training events. We again found that readiness reports did not indicate the extent to which encroachment has significantly affected reported training readiness. We also testified twice on these issues—in May 2002 and April 2003—noting that, while DOD had made some progress in addressing individual encroachment issues, efforts were still evolving and more would be required to put in place a comprehensive plan to address the department's encroachment issues.[20]

Despite Some Positive Examples, Cooperative Management for Endangered Species Affecting Military Training Ranges Is Limited

Notwithstanding some positive efforts to implement regional interagency cooperative efforts, the extent to which DOD and other federal land managers are managing cooperatively for endangered species affecting military training ranges is limited. Recognizing the benefits of cooperatively managing natural resources, the Departments of the Interior and Agriculture have issued policies, and DOD has issued directives, instructions, and an action plan to promote such efforts. In addition, these departments have entered into memorandums of understanding that contain specific actions to be taken to implement cooperative management—such as forming interagency working groups, identifying geographic regions for species management, and identifying reporting requirements—but many of these actions were never fully implemented. In cases where cooperative management efforts were undertaken, they were generally undertaken in response to a crisis. (See app. II for more details on DOD's and other federal agencies' policies and initiatives that promote cooperative management.)

[19] GAO-02-614.

[20] GAO-02-727T and GAO-03-621T.

Some Positive Examples Show Cooperative Management Has Benefits for DOD and Other Federal Land Managers

The Departments of Defense, the Interior, and Agriculture and other federal land managers recognize that cooperative management of endangered species is beneficial to both the agencies and the species. The *Interagency Handbook for the Joint Stewardship of Withdrawn or Permitted Federal Lands Used by the Military* stated that cooperative relations among the military services and other land management agencies can provide benefits beyond what could be achieved if each agency approached the issue separately.[21] In addition, a 1996 Keystone Center[22] report stated that a regional approach increases opportunities for military commanders to achieve compliance with the Endangered Species Act and to share the burden for natural resource conservation with other landowners, thereby potentially reducing the impact on military land.[23]

DOD and other federal land managers generally agree that interagency cooperative management of endangered species has benefits, such as sharing the costs of recovery efforts, the burden of land-use restrictions, and expertise and resources, as shown in the following examples:

- At the Barry M. Goldwater Range, land managers are sharing the cost of some recovery efforts to increase the endangered Sonoran pronghorn's population, which the managers might not have been able to fund or undertake, if not done cooperatively. For example, the Marine Corps, the U.S. Fish and Wildlife Service, the Bureau of Land Management, and the Arizona Game and Fish Department each contributed one-fourth of the funding for a genetic study of the pronghorn, the results of which are important for determining the types of recovery actions the land managers can use to protect the species.

- Another effort at the Barry M. Goldwater Range benefits both the species and the Air Force. According to range operating instructions, if pronghorn

[21] Interagency Military Land Use Coordination Committee, *Interagency Handbook for the Joint Stewardship of Withdrawn or Permitted Federal Lands Used by the Military* (Draft), Sept. 2002.

[22] The Keystone Center is a non-profit public policy and educational organization that assists organizations, primarily government agencies, in support of their efforts to obtain consensus input for a wide range of rules, regulations, and pilot projects designed to implement new or existing laws, regulations, or institutional approaches. Keystone services in these efforts have included facilitation, process design, project management, and logistical support.

[23] Keystone Center, *Department of Defense Biodiversity Management Strategy* (Keystone, Colo.: Jan. 23, 1996).

are spotted on the range within a prescribed distance from the target, training must be cancelled or moved. DOD and nearby federal land managers in the region agreed to create forage enhancement plots on an adjacent national wildlife refuge that entices the pronghorn to the plots and away from the targets.[24]

- Federal agencies can also benefit by sharing expertise and resources through cooperative management efforts. For example, the Midwest Natural Resources Group meets three times a year to discuss various land management issues, crises that are affecting them, and ways they can help each other.[25] At one of these meetings, according to a U.S. Fish and Wildlife Service official, the Forest Service asked for help to develop a land management plan for endangered species. As a result, the U.S. Fish and Wildlife Service colocated one of its employees at a Forest Service office to, among other things, assist with the plan. Another example of sharing expertise and resources through cooperative management efforts is the Southwest Strategy group,[26] which was created by the Secretaries of the Interior and Agriculture and the Deputy Under Secretary of Defense for Environmental Security in 1997 to develop and implement a strategy to more effectively coordinate, among other things, natural resource issues in Arizona and New Mexico. The group has also eliminated duplicative data collection and analysis efforts.

- In its response to a draft of this report, the Department of the Interior provided a few other examples of cooperative management. One was between the Air Force's Dare County Bomb Range, North Carolina, and the Alligator River National Wildlife Refuge where they are managing cooperatively for the endangered red-cockaded woodpecker and the endangered red wolf. It also cited two examples of cooperation between

[24] Forage enhancement plots allow land managers to encourage the growth of food for the Sonoran pronghorn in conditions in which this might not occur, such as a drought.

[25] Members of the Midwest Natural Resources Group include U.S. Fish and Wildlife Service, National Park Service, U. S. Geological Survey, Natural Resources Conservation Service, U.S. Army Corps of Engineers, Office of Surface Mining, Bureau of Land Management, Bureau of Indian Affairs, Forest Service, U.S. Coast Guard, Department of Energy, Environmental Protection Agency, National Oceanic and Atmospheric Administration, and the Federal Highway Administration.

[26] Members of the Southwest Strategy group include DOD, Bureau of Indian Affairs, Bureau of Land Management, Bureau of Reclamation, U.S. Fish and Wildlife Service, U.S. Geological Survey, National Park Service, Natural Resources Conservation Service, Forest Service, Rural Development, Environmental Protection Agency, Department of Justice, Offices of the Governors of Arizona and New Mexico, and the Southwest Fire Management Board.

DOD and the Forest Service. Specifically, the Army at Fort Polk, Louisiana, is managing cooperatively with the Kisatchie National Forest to limit land-use restrictions on the range and recover the endangered red-cockaded woodpecker. At Eglin Air Force Base, Florida, the Air Force is working with the Conecuh National Forest to cooperatively manage for the red-cockaded woodpecker. According to agency officials, these efforts have limited land-use restrictions on the training range and helped recover the species.

Departments of the Interior and Agriculture Policies and DOD Directives, Instructions, and an Action Plan Advocate Broad Cooperative Management Approaches

The Departments of the Interior and Agriculture have issued policies and DOD has issued directives, instructions, and an action plan that call for broad cooperative management of natural resources.

The Department of the Interior's policy for effective program management is defined as "conservation through cooperation, consultation and communication," which includes cooperation and collaboration on endangered species management. In addition, Interior's *Draft Revised Strategic Plan for 2003-2008* states that it will strive to protect habitat that supports endangered and other native species through an increasing number of partnership efforts.[27] Several land management agencies within Interior—the Bureau of Land Management, the National Park Service, and the U.S. Fish and Wildlife Service's National Wildlife Refuge System—have policies with similar commitments to manage cooperatively for endangered species.

The Department of Agriculture's *Strategic Plan for FY2002-2007* identifies five major programmatic policies, including protecting and enhancing the nation's natural resource base and environment.[28] As part of these policies, the department states that it will strive to manage and protect America's public and private lands by working cooperatively with other federal agencies. In addition, the *Forest Service Manual* promotes an interagency cooperative approach to endangered species management.

DOD has issued directives, instructions, and an action plan that promote an interagency cooperative approach to natural resource

[27] Department of the Interior, *Draft Revised Strategic Plan for 2003-2008* (Washington, D.C.: Feb. 2003).

[28] Department of Agriculture, *Strategic Plan for FY 2002-2007* (Washington, D.C.: Sept. 2002).

management, which includes endangered species management, as in the following examples:

- DOD's natural resources management program directive states that DOD should coordinate its natural resources program with other federal agencies.[29]

- DOD's environmental security directive[30] and regional environmental coordination instruction[31] establishes a system of regional environmental coordinators, which could facilitate DOD's efforts to manage for endangered species on its training ranges and identify opportunities to work with other federal land managers on natural resource issues.

- DOD's environmental conservation program instruction[32] establishes that integrated natural resources management plans shall incorporate the principles of ecosystem management[33] that supports present and future mission requirements and is realized through effective partnerships among federal interests.

- DOD's sustainment of ranges and operating areas directive[34] establishes policy and assigns responsibilities for the sustainment of test and training ranges, and states that DOD should enter into cooperative agreements and partnerships with other federal agencies to sustain training ranges by, among other things, managing for endangered species.

In 2001, DOD drafted an action plan for each of the eight encroachment issues identified as having significant negative impact to its training and

[29] DOD Directive, *Natural Resources Management Program*, 4770.4 (Washington, D.C.: Jan. 24, 1989).

[30] DOD Directive, *Environmental Security*, 4715.1 (Washington, D.C.: Feb. 24, 1996).

[31] DOD Instruction, *Regional Environmental Coordination*, 4715.2 (Washington, D.C.: May 3, 1996).

[32] DOD Instruction, *Environmental Conservation Program*, 4715.3 (Washington, D.C.: May 3, 1996).

[33] Ecosystem management is a method for sustaining or restoring natural systems and their functions and values. Ecosystems cross agency boundaries, making the need for cooperation, coordination, and partnerships essential to implement ecosystem management.

[34] DOD Directive, *Sustainment of Ranges and Operating Areas (OPAREAs)*, 3200.15 (Washington, D.C.: Jan. 10, 2003).

readiness. Specifically, the draft *Endangered Species Act Sustainable Range Action Plan* contains a combination of administrative and legislative initiatives to balance endangered species management with mission requirements. The plan addresses, among other things, the need for the Office of the Secretary of Defense and the military services to build new and expand upon existing partnerships—such as the Barry M. Goldwater Range Executive Council[35]—and to work in cooperation with the U.S. Fish and Wildlife Service and other federal land management agencies as a way to accommodate military training while meeting legal requirements for endangered species protection and conservation. However, DOD officials told us that the department could do more to implement the action plan.

Interagency Agreements for Cooperative Management Have Been Adopted, but Not Fully Implemented

In addition to agency policies, directives, instructions, and an action plan, DOD and other federal agencies have entered into several agreements for the purpose of implementing a cooperative approach to endangered species management. However, many of the specific actions in these agreements were never fully implemented and most agreements have expired.

Fourteen federal agencies—including the Departments of Defense, the Interior, and Agriculture—entered into the 1994 *Memorandum of Understanding on Implementation of the Endangered Species Act*. According to a DOD official, this was in response to two legislative proposals that could have reduced the scope and authority of the act. The memorandum stipulated that the participants establish a general framework for cooperation and establish a national interagency working group that would coordinate the implementation of the Endangered Species Act by, among other things, identifying geographic regions for species management and reporting its accomplishments annually to the public. In commenting on a draft of this report, the Departments of the Interior and Agriculture stated that some efforts were undertaken as a result of this memorandum, and they believe interagency cooperation had increased. However, we found that some officials at the land management agencies we visited were unaware of this memorandum. According to two

[35] Members of the Barry M. Goldwater Range Executive Council include the Air Force, Marine Corps, Arizona Game and Fish Department, Bureau of Land Management, U.S. Fish and Wildlife Ecological Services, National Park Service's Organ Pipe Cactus National Monument, U.S.Fish and Wildlife Service's Cabeza Prieta National Wildlife Refuge, and U.S. Customs and Border Protection.

officials who helped develop the agreement, the legislative proposals failed, and management support for cooperative management for endangered species was subsequently reduced. As a result, the national interagency working group was never formed, and the annual reporting requirements were never met. The memorandum expired in 1999.

In addition, the Departments of Defense, the Interior, and Agriculture and other federal agencies signed the 1995 *Memorandum of Understanding to Foster the Ecosystem Approach* to implement the recommendations of the Interagency Ecosystem Management Task Force.[36] The task force recommended that agencies should engage in coordinated, integrated actions and adopt principles to provide guidance for participating in ecosystem efforts. The federal agencies agreed to participate in interagency efforts and look for new opportunities for cooperative efforts. The agencies also designated oversight responsibility and agreed to report on their accomplishments to the task force. According to a knowledgeable DOD official, the task force dissolved when changes were made to the task force's leadership and personnel, and neither DOD nor other federal agencies initiated any coordinated approaches as a result of this memorandum; it expired in 1999.

The Departments of Defense, the Interior, Agriculture, and another federal agency, as part of their efforts on the Interagency Military Land Use Coordination Committee,[37] drafted a memorandum in 2002 promoting the coordination of land use activities. The memorandum encourages federal land managers to work together and regularly discuss military and other land-use issues with nearby land managers and to consider the effects of their actions on lands managed by other federal agencies. In addition, the

[36] In August 1993, the Interagency Ecosystem Management Task Force was established to carry out Vice President Gore's National Performance Review mandate, which called for the agencies of the federal government to adopt a proactive approach to ensuring a sustainable economy and a sustainable environment through ecosystem management. The task force was made up of representatives from the Departments of Agriculture, Army, Commerce, Defense, Energy, Housing and Urban Development, the Interior, Justice, Labor, State, and Transportation; the Environmental Protection Agency; Office of Science and Technology Policy; Office of Management and Budget; and Council on Environmental Quality.

[37] In 1999, the Departments of Defense, the Interior, and Agriculture entered into a memorandum of understanding creating the Interagency Military Land Use Coordination Committee to maintain a continued dialogue on issues of interest and to foster cooperation and communication. Subsequently, the Department of Energy, Department of Transportation, and General Services Administration joined the committee. The memorandum expires in October 2004.

memorandum stipulates that the committee develop overarching policies and procedures to ensure that federal land managers implement this approach. Also, it is expected that federal land managers would develop agency-specific policies and procedures for engaging other federal land managers on a routine basis and report to the committee annually on their progress. To date, the committee has not acted on this memorandum. According to a cognizant DOD official, once the memorandum is signed, it is still unclear how the actions outlined in the memorandum would be implemented or affect agency participation in cooperative management efforts.

Cooperative Management Efforts Undertaken Generally in Response to a Crisis

While there are some examples of cooperative management efforts between DOD and other federal land managers, most of these efforts have been undertaken in response to a crisis. Such crises can include a marked decline of a species' population or land-use restrictions that may impact the federal land managers' ability to carry out their missions. Experience has shown that when there is not a crisis, there is little incentive to cooperate.

Because of a marked decline in the number of Sonoran pronghorn at the Barry M. Goldwater Range, federal and other land managers were being pressured by the public to manage cooperatively in support of the species. As a result, regional land managers formed the Barry M. Goldwater Range Executive Council in 1997 to discuss issues of concern, ensure consistent land management in the region, and identify and coordinate species recovery efforts. The council identifies and prioritizes pronghorn recovery efforts and has agreed to a number of initiatives to help preserve the species, such as establishing forage enhancement plots. As a result, restrictions on the training range have been minimized through DOD and other federal land managers' efforts to cooperate on protective measures on nonmilitary lands.

Recently, the Departments of Defense, the Interior, and Agriculture reacted to the potential listing of the black-tailed prairie dog. The U.S. Fish and Wildlife Service received a petition to list the black-tailed prairie dog and according to the Department of the Interior, it is working with 11 states, DOD, the Department of Agriculture, and other stakeholders to coordinate their conservation and management efforts for the species and its habitat. A memorandum of understanding among these agencies to enhance cooperation for the conservation and management of the black-tailed prairie dog is currently being staffed for signature. According to a knowledgeable Army official, the federal land managers agreed to work

together because of the potential loss of land management flexibility should the species be listed. For example, the Army is concerned about land-use restrictions and impacts to training at Fort Carson, Colorado, and other installations should the black-tailed prairie dog be listed. By working together, federal land managers believe that they have better managed for the species and helped avoid the need to list the species, which could result in land-use restrictions.

Factors Limiting Cooperative Management for Endangered Species

The Departments of Defense, the Interior, and Agriculture have identified a number of factors that can limit interagency cooperative management for endangered species affecting military training ranges. These factors include a lack of a shared crisis among federal land managers, limited agency interaction, resource constraints, lack of land manager training and experience, and the lack of centralized or otherwise easily accessible source of information. However, these departments have not developed a comprehensive strategy to address these factors.

Lack of a Shared Crisis among Federal Land Managers Hinders Cooperative Management

When there is not a shared crisis among federal land managers, such as when a species does not exist on each other's land or is not federally listed, federal land managers do not always consider management of the species a high priority. This in turn, can limit their participation in cooperative management for the species, as in the following examples:

- At the Yakima Training Center, the potential loss of key areas of its tank maneuver range prompted the Army to initiate the Washington (formerly Western) Sage Grouse Working Group in 1996 in an effort to engage nearby land managers in western sage grouse management efforts.[38] The training center manages the sage grouse, a candidate species,[39] to prevent restrictions on the training range that may occur should the species be

[38] Members of the Washington Sage Grouse Working Group include the Yakima Training Center, Bureau of Land Management, U.S. Fish and Wildlife Ecological Services, Washington Department of Fish and Wildlife, Yakama Nation, the Department of Energy, and the U. S. Fish and Wildlife Service Hanford Reach National Monument. Previous members include the Natural Resources Conservation Service, Farm Service Agency, Bureau of Reclamation, Washington State Department of Natural Resources, and the Colville Federated Tribes.

[39] Candidate species are plants and animals for which the U.S. Fish and Wildlife Service has sufficient information on their biological status and threats to propose them as endangered or threatened under the Endangered Species Act, but for which development of a listing regulation is precluded by other higher priority listing activities.

federally listed. One of the Army's goals for the working group was to create a regional conservation plan for the sage grouse that would include individual conservation management plans from each of the nearby land managers. Although other land managers attend working group meetings, they have not completed their plans because they do not place the same priority on recovering the western sage grouse as the Army, as the species is not listed and is not found on their lands. Consequently, the Army will continue to bear the majority of the responsibility of managing for the western sage grouse.

- At Naval Amphibious Base Coronado, California, the Navy has held numerous meetings with other land managers to encourage regional management of the least tern and the snowy plover, which are federally listed species. However, Navy officials told us that, to date, they have not received commitment from local land managers to share the burden of species management. The presence of these birds has resulted in the lost use of the majority of the base's training beaches. For example, while there are 14 beach lanes[40] at Naval Amphibious Base Coronado, 4 lanes have been completely closed because the birds occupy the lanes, and training on 5 additional lanes is restricted when the birds are present. Consequently, Navy officials said they have to substantially alter training activities or conduct them elsewhere, which disrupts training cycles, increases costs, and adds to the time sailors spend away from their families. To reduce the burden of training range restrictions caused by the presence of the birds, the Navy has identified the opportunity to move some birds to a nearby national wildlife refuge where there is an established bird population. Navy officials added that the wildlife refuge has not cooperated as much as the Navy would like. However, according to a refuge official, the Navy has never officially requested that the refuge accept additional birds and currently the refuge is doing all it can do to share the burden of species management in the region.

Limited Agency Interaction Affects Cooperative Management

Another factor that impacts cooperative management for endangered species affecting training ranges is limited agency interaction. Various agency officials stated that the lack of regular exchanges of information has led to a lack of trust, a lack of a single vision, inefficiencies, duplication of efforts, and misunderstanding of other agencies' missions.

[40] Beach lanes are training corridors that are comprised of 95 percent water and 5 percent landing (beach) area and are used for amphibious landing by Marine Corps and Navy personnel.

For example, U.S. Fish and Wildlife Service officials have suggested that the Army at the Yakima Training Center should relocate its training to other nearby locations to preserve the western sage grouse habitat. According to Army officials, this suggestion demonstrates a lack of understanding of the Army's training mission at the Yakima Training Center because these nearby locations are neither large enough to allow live fire or tank formations nor topographically suited to tank maneuver training.

DOD and other agency officials have stated that regular coordination and communication should be addressed at national, regional, and local levels by establishing interagency working groups and exchanging or colocating staff among agencies at each of these levels. There is some coordination at the headquarters level through liaison positions and the Endangered Species Roundtable, an informal group comprised of members from the Department of Defense, military services, and U.S. Fish and Wildlife Service, which have enhanced coordination and communications since 1999. This also occurs on a limited basis at the local level, such as the Barry M. Goldwater Range Executive Council. However, it does not occur regularly at all three levels. For example, DOD created regional environmental coordinator positions at each of the 10 Environmental Protection Agency regional offices to address environmentally related issues in the regions. According to a former Deputy Under Secretary of Defense, even though these regional coordinators' current focus is on compliance issues, that should not preclude them from interacting with other federal land managers in a broader capacity such as for endangered species management. DOD and other federal agencies have proposed that these regional coordinators bring together regional, state, and local officials to address sustainable range issues including endangered species.

Resource Constraints Limit Cooperative Management

Defense, Interior, and Agriculture officials said that resource constraints, such as funding, staff, and a lack of incentives, limit efforts to manage cooperatively for endangered species affecting military training ranges.

A former Deputy Under Secretary of Defense said that installation commanders face chronic underfunding issues and mission-related projects take priority over other projects, such as cooperative management activities. At Fort Lewis, Army officials stated that based on discussions with other federal officials, these agencies lack the resources to participate in endangered species-related projects, such as species inventories. In addition, knowledgeable U.S. Fish and Wildlife Service officials told us that the service is underfunded and understaffed and

spends most of its time on lawsuits and other priorities. Department of the Interior headquarters officials also said that limited funding and staff is a significant barrier to better cooperation. They explained that much of what the U.S. Fish and Wildlife Service does is driven by lawsuits and that there are not enough funds to cover all endangered species needs. They also suggested that a U.S. Fish and Wildlife Service strategic planner could facilitate cooperation and coordination with DOD. Subsequently, DOD and the military services are now funding a U.S. Fish and Wildlife Service liaison position. Similarly, a Forest Service headquarters official said that limited funding and staffing are barriers to cooperative management efforts.

A 2002 Army Environmental Policy Institute study concluded that understaffing is a common problem for both installation environmental and natural resources programs.[41] At several installations included in the study, a lack of staff was viewed as a critical issue and, in some cases, cooperative management implementation was limited due to understaffing. For example, at Fort Knox, Kentucky, the Army reported there is a lack of staff to implement cooperative management efforts and insufficient funding to support cooperative management projects. Understaffed natural resources offices find they can respond to short-term initiatives and immediate demands, but longer-term cooperative management initiatives are conducted piecemeal and only as time permits. In addition, the study states that partnerships to create a regional vision require commitment, which in turn requires funding and staff. However, developing this vision is often not a high priority for an installation, and therefore there is usually little funding available to implement projects that support cooperative management efforts. Without enough qualified environmental professionals on staff, successful cooperative management is greatly inhibited.

Officials from the Departments of Defense, the Interior, Agriculture, and other federal agencies stated that they lack incentives to manage cooperatively. For example, Department of the Interior officials stated that interagency cooperative management is not part of their performance expectations and they are not rated on their ability to manage cooperatively for endangered species with DOD and other federal land

[41] Army Environmental Policy Institute, *Department of Defense Ecosystem Management Policy Evaluation*, AEPI-IFP-0802F (Atlanta, Ga.: Aug. 2002). The evaluation included information from case studies at eight military installations.

managers.[42] At Fort Knox, issues and activities facing command and staff tend to be relatively near term and personnel are rewarded for their abilities to address these issues quickly. Cooperative management, on the other hand, is a fundamentally long-term endeavor. The divergence of these time frames makes cooperative management efforts difficult.

Lack of Training and Expertise Limits Cooperative Management

DOD officials and other federal land managers said that a lack of training and expertise has limited federal land managers' ability to identify opportunities for cooperative management efforts as well as the neighboring land managers needed to implement them. The Department of the Interior, in commenting on a draft of this report, stated that many courses are available at the U.S. Fish and Wildlife Service's National Conservation and Training Center that could facilitate federal land managers' ability to identify opportunities for cooperative management. However, U. S. Fish and Wildlife Service officials stated that additional training is needed to train land managers to identify opportunities for interagency cooperation and to implement cooperative efforts. The Army Environmental Policy Institute study concluded that there is a large turnover in natural resources staff at military installations due to low pay and limited advancement opportunities, and the newly hired staff requires considerable training in natural resources issues.[43] For example, according to the study, field biologists at Naval Base Ventura County Point Mugu, California, are critical to managing the ecosystem. However, field biologists' salaries are very low and they lack job security, so turnover is high. As a result, the natural resources manager needs to frequently rehire and train biologists.

DOD officials noted that staff reductions and the reliance on contractors to perform some functions have resulted in the loss of institutional memory and expertise that has adversely affected long-term initiatives, such as cooperative management for endangered species. This lack of expertise in natural resources programs limits the abilities of managers to implement cooperative management efforts. For example, at Robins Air Force Base, Georgia, installation environmental staff suggested that cooperative management requires existing staff to have a broader and

[42] In responding to a draft of this report, the Department of the Interior stated that its managers are expected to implement the Secretary's conservation policy that includes cooperation and collaboration.

[43] AEPI-IFP-0802F.

more diverse skill set than ever before, and more specialized training is needed toward that end. In addition, U.S. Fish and Wildlife Service officials said that high staff turnover at some national wildlife refuges leads to a loss of expertise, which makes it difficult to establish and maintain good working relationships with other agencies.

Lack of Centralized or Otherwise Easily Accessible Source of Information Limits Cooperative Management

The Departments of Defense, the Interior, and Agriculture and other federal agencies lack a centralized or otherwise easily accessible source of information, which could facilitate the exchange of reliable, current, and consistent information among and between federal land managers.

Officials with The Nature Conservancy, a nongovernmental organization that works cooperatively with DOD and other federal land managers, noted that the federal agencies lack a simple, comprehensive, and reliable way to learn from each other's successes and failures in conservation planning and action, and of ongoing conservation plans and actions being conducted within the region. The officials added that information related to cooperative management efforts is often incomplete, outdated, difficult to access, and not widely available. For example, while DOD's Defense Environmental Network and Information Exchange is centralized and fairly good, the network is not widely available, does not contain comprehensive data on lessons learned or best practices of interagency cooperative management, and contains mostly information related to policies or regulations. In addition, according to DOD officials, federal agencies have no established method to share and integrate endangered species research, development, monitoring actions, priorities, and results. They identified this as being a serious impediment to developing the science needed for interagency cooperative management of endangered species.

DOD and other federal land managers suggest that information such as agency points of contact, land management and conservation plans, description of agency missions, training opportunities, and interagency meetings and conferences is needed to encourage more cooperative management efforts. Such information, which could be provided through agency Web sites, should be readily accessible to all land managers and could facilitate cooperative efforts.

Federal Land Managers Lack a Comprehensive Implementation Strategy to Overcome Limiting Factors

While the Departments of Defense, the Interior, and Agriculture and other federal land managers have identified several factors discussed above as limiting their ability to manage cooperatively, they have not developed a comprehensive strategy to address them. The Army Environmental Policy Institute study concluded that using the current project-by-project approach to cooperative management would guarantee its ultimate failure as an overall implementation strategy.[44] According to DOD officials, there needs to be a more comprehensive strategic approach to cooperative management for natural resources management. They added that initiatives such as those at the Barry M. Goldwater Range for the Sonoran pronghorn should not come about as a result of a crisis, but rather from a systematic approach to identify cooperative management opportunities. In addition, a former Deputy Under Secretary of Defense stated there needs to be a systematic and structured process for natural resources management. DOD and other agency and nongovernmental officials added that the current administration supports cooperative management efforts and that federal land managers need to reach agreement on how best to approach cooperative management. Also, in commenting on a draft of this report, the Department of the Interior stated that its mission is integrally tied to cooperative natural resources conservation and management, while U. S. Fish and Wildlife Service officials we interviewed during this review suggested there needs to be a strategy to institutionalize cooperative management efforts. Such a strategy could include a systematic methodology to identify opportunities to participate in cooperative management efforts, funding sources, science and technology sources, and goals and criteria to measure success.

Moreover, federal land management agencies are not subject to any reporting requirements to Congress on regional interagency cooperative management efforts for endangered species affecting military training ranges. Congress typically uses agency or program annual reports to monitor and hold accountable the federal agencies that oversee or implement programs. However, Congress currently has no such mechanism available to monitor interagency efforts to cooperatively manage endangered species on a regional basis.

[44] AEPI-IFP-0802F.

Conclusions

DOD and other federal land managers' efforts to cooperatively manage endangered species affecting military training ranges are limited, and there are numerous factors that hinder these efforts. Without an interagency strategy that addresses these factors, DOD and other federal land managers are likely to continue undertaking cooperative management efforts in response to crises. A strategy that includes a systematic methodology to identify opportunities for cooperative management efforts, funding sources, science and technology sources, and goals and criteria to measure success would facilitate federal land managers sharing the burden of land-use restrictions and limited resources, and potentially help avoid exacerbating constraints on training at affected military installations. Similarly, without training programs to train land managers to identify opportunities for interagency cooperation as well as to train neighboring land managers to implement cooperative efforts, DOD and other federal land managers may miss opportunities to manage endangered species more effectively while carrying out their land management responsibilities. In addition, without a centralized or otherwise easily accessible source of information that includes elements such as lessons learned, best practices, and agency contacts, DOD and other federal land managers cannot easily share information or learn about cooperative management efforts within and across agencies. Given that federal agencies have made little progress in implementing the various agreements for cooperative management, an interagency reporting requirement to Congress would provide the basis to hold the agencies accountable for making progress on sharing the management for endangered species affecting military training ranges.

Recommendations for Executive Action

To encourage cooperative management for endangered species affecting military training ranges, we recommend that the Secretaries of Defense, the Interior, and Agriculture jointly (1) develop and implement an interagency strategy that includes a systematic methodology to identify opportunities for cooperative management efforts, funding sources, science and technology sources, and goals and criteria to measure success; (2) develop a comprehensive training program for federal land managers, to include senior executives, regional, and on-site staff to identify and implement opportunities for interagency cooperation; and (3) create a centralized or easily accessible source of information on cooperative management efforts that includes elements such as lessons learned, best practices, and agency contacts for federal land managers.

Matter for Congressional Consideration

To hold DOD and other federal land managers accountable for implementing regional interagency cooperative efforts for managing endangered species affecting military training ranges, Congress may wish to consider requiring the Secretaries of Defense, the Interior, and Agriculture to jointly report each year on their efforts to manage cooperatively for endangered species affecting military training ranges and share the burden of land use restrictions.

Agency Comments and Our Evaluation

We received written comments on a draft of this report from the Departments of Defense, the Interior, and Agriculture. They agreed on the need to improve interagency cooperation in managing for endangered species.

In commenting on a draft of this report, the Acting Assistant Deputy Under Secretary of Defense for Environment agreed with our recommendations with some additional observations. Concerning our recommendation to develop and implement an interagency strategy for cooperative management efforts, DOD stated that the Interagency Military Land Use Coordination Committee structure and process could be used to develop a strategy. While we agree that the committee could be used to develop the interagency strategy and methodology, the committee has periods of inactivity and the memorandum of understanding that formed this group is set to expire in October 2004. Therefore, we believe that a more formalized effort needs to be undertaken with support from the Secretary of each department. In commenting on our recommendation that the departments with land management responsibilities jointly develop an education program, DOD agreed but suggested a focus on training rather than education might be more appropriate. We agreed and have modified the recommendation accordingly. DOD's comments are reprinted in appendix III.

In commenting on a draft of this report, the Department of the Interior's Assistant Secretary for Policy, Management and Budget generally agreed with our findings, noting that its agencies are continually working to improve and expand interagency coordination and cooperation and stating that our recommendations could help link conservation efforts among the departments and produce better information for land managers to address endangered species issues. The department also stated that it was concerned the recommendations would likely create increased demands on already strained resources. However, we believe that if cooperative management were incorporated into the department's daily management practices as stated in the department's policy of "conserving through

cooperation" and not viewed as a separate effort, the impact on resource requirements could be limited. At the same time, based on the department's concerns about resource requirements and recognizing the prevalence of Web-based information systems, we modified our second recommendation to suggest that a centralized or otherwise easily accessible source of information be developed. In addition, the department also expressed the view that the level of coordination and cooperation between the department and DOD is more extensive than the report's findings indicated. The department suggested that the report should include a more comprehensive view of current interagency cooperation for management of endangered species. While the department suggested a number of additional instances of interagency cooperation, we found that many of them were more related to regulatory consultations[45] than efforts to achieve increased cooperative management between federal land managers on a regional basis. Nevertheless, we did include a few additional examples as appropriate. The Department of the Interior's comments are reprinted in appendix IV.

In commenting on the draft of this report, the Department of Agriculture did not respond directly to our recommendations for executive action, but indicated that it strongly supports interagency cooperative management for endangered species. The Department of Agriculture's comments are reprinted in appendix V.

The Departments of Defense, the Interior, and Agriculture also provided various technical comments that we incorporated as appropriate.

As requested by your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution of it until 30 days from the date of this report. We will then send copies of this report to the appropriate congressional committees, as well as the Secretaries of Defense, the Interior, and Agriculture. 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/.

[45] The Endangered Species Act requires all federal agencies to consult with the U.S. Fish and Wildlife Service or the National Marine Fisheries Service to determine the effect that the activities they conduct, permit, or fund may have on threatened or endangered species.

If you or your staff have any questions on the matters discussed in this report, please contact Barry Holman at (202) 512-8412, or Barry Hill at (202) 512-9775. Patricia Nichol, Tommy Baril, Michelle K. Treistman, Byron Galloway, Patricia McClure, Mark Little, and R.K. Wild were major contributors to this report.

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Appendix I: Scope and Methodology

To identify the extent to which DOD and nearby federal land managers are managing cooperatively for endangered species affecting military training ranges on a regional basis, we met with officials of the Office of the Deputy Under Secretary of Defense for Installations and Environment; Office of the Deputy Under Secretary of Defense for Readiness; the Environmental Programs Division, Office of the Civil Engineer, Headquarters, Air Force; Director of Ranges and Airspace, Air and Space Operations, Headquarters, Air Force; the Office of the Director for Environmental Programs, Army Assistant Chief of Staff for Installation Management; the Land Use and Military Construction Branch, Installations and Logistics Department, Headquarters, Marine Corps; Environmental Readiness Division, Office of the Chief of Naval Operations, Department of the Navy; the Army Forces Command; the Air Force Air Education and Training Command; Luke Air Force Base, Arizona; Marine Corps Air Station Yuma, Arizona; and Fort Lewis, Washington. We also met with headquarters and field officials of the Departments of the Interior and Agriculture, including the Bureau of Land Management, the U.S. Fish and Wildlife Service and its National Wildlife Refuge System, the National Park Service, and headquarters officials at the Forest Service. In addition, we interviewed a former Deputy Under Secretary of Defense and officials with nongovernmental organizations including the Endangered Species Coalition, The Nature Conservancy, and the International Association of Fish and Wildlife Agencies. We also visited three training ranges—Yakima Training Center, Washington; Fort Lewis, Washington; and the Barry M. Goldwater Training Range, Arizona—in order to identify the extent to which the training ranges and the nearby federal land managers are managing cooperatively for endangered species. Specifically, we visited the Yakima Training Center based on discussions with Army officials about their unsuccessful attempts to work with other federal land managers in the region. We also visited with officials at Fort Lewis, as they previously managed the Yakima Training Center. We visited the Barry M. Goldwater Training Range based on discussions with various DOD and other federal agency officials concerning the successful cooperative management efforts that have been undertaken in the region. We also obtained and analyzed information from nearby land managers, state wildlife agency officials, Native American Tribal representatives, and nongovernmental organizations in Washington and Arizona on their views of cooperative management and the extent to which they are cooperating with the training range in the management of endangered species. To identify the policies of the major land management departments—Departments of Defense, the Interior, and Agriculture—that promote a cooperative approach to natural resources and endangered species management, we reviewed DOD directives, instructions, and an

action plan that promote cooperative approaches to further sustainment objectives to include training ranges. We also reviewed a DOD-sponsored tri-service partnering guide for environmental missions of the Army, Navy, and Air Force. The guide was created for the purpose of encouraging greater use of partnering at the policy, installation, and project levels of several DOD programs, including conservation. In addition, we reviewed the military services implementing instructions for the management of natural resources. We also reviewed policies, instructions, land-use planning documents, and manuals for the implementation of the Endangered Species Act from selected agencies of the Departments of the Interior and Agriculture and reviewed a number of their memorandum of understanding to cooperate in the execution of the Endangered Species Act.

To determine the factors that limit cooperative management of endangered species affecting military training ranges, we met with officials of the Office of the Deputy Under Secretary of Defense for Installations and Environment; Office of the Deputy Under Secretary of Defense for Readiness; the Environmental Programs Division, Office of the Civil Engineer, Headquarters, Air Force; Director of Ranges and Airspace, Air and Space Operations, Headquarters, Air Force; the Office of the Director for Environmental Programs, Army Assistant Chief of Staff for Installation Management; the Land Use and Military Construction Branch, Installations and Logistics Department, Headquarters, Marine Corps; Environmental Readiness Division, Office of the Chief of Naval Operations, Navy; the Army Forces Command; and the Air Force Education and Training Command. In addition, we met with a former Deputy Under Secretary of Defense. We also met with officials of the Departments of the Interior and Agriculture, including the Bureau of Land Management, the U.S. Fish and Wildlife Service and its National Wildlife Refuge System, the National Park Service, and the Forest Service. We also analyzed and compared the views of officials at the Yakima Training Center and Barry M. Goldwater Training Range to the responses obtained from neighboring land managers, DOD, and other agency officials cited above, and relevant program officials. We also reviewed reports that document issues that were identified as obstacles to achieving cooperative management, including the August 2002 Army Environmental Policy Institute's *Department of Defense Ecosystem Management Policy Evaluation*[1] and the draft September 2002

[1] Army Environmental Policy Institute, *Department of Defense Ecosystem Management Policy Evaluation*, AEPI-IFP-0802F (Atlanta, Ga.: Aug. 2002). The evaluation included information from case studies at eight military installations.

Interagency Handbook for the Joint Stewardship of Withdrawn or Permitted Federal Lands Used by the Military[2] and our 1994 report entitled *Ecosystem Management: Additional Actions Needed to Adequately Test a Promising Approach*.[3] In all, we sought to identify common reasons cited by program officials and land managers for their inability to pursue cooperative regional management of endangered species.

We conducted our work from September 2002 through September 2003 in accordance with generally accepted government auditing standards.

[2] Interagency Military Land Use Coordination Committee, *Interagency Handbook for the Joint Stewardship of Withdrawn of Permitted Federal Lands Used by the Military* (Draft), Sept. 2002.

[3] U.S. General Accounting Office, *Ecosystem Management: Additional Actions Needed to Adequately Test a Promising Approach*, GAO/RCED-94-111 (Washington, D.C.: Aug. 16, 1994).

Appendix II: Timeline of DOD's and Other Federal Agencies' Policies and Initiatives That Promote Cooperative Management

1989

Jan. 24	DOD Directive 4700.4, *Natural Resources Management Program*, that, among other things, requires DOD to coordinate its natural resources program with other federal agencies and develop criteria and procedures for cooperative planning and integrated natural resources management planning process; and establish a DOD Natural Resources Council.

1994

	U.S. Fish and Wildlife Service, *An Ecosystem Approach to Fish and Wildlife Conservation*, guides the agency's implementation of ecosystem management.
Jan. 25	Interagency memorandum of understanding—*Candidate*, *Proposed*, *and Sensitive Species*—signed by five federal agencies, encourages federal agencies to address the threats to these species, thereby reducing or possibly eliminating the need for them to be federally listed—especially those species that require regional/ecosystem conservation actions. The memorandum expired in September 1999.
March 24	Congressional Research Service, at the request of six congressional committees, hosted a two-day ecosystem management symposium for federal agencies to identify opportunities for interagency cooperative management.
April 26	Department of the Army, U.S. Fish and Wildlife Service, and the National Biological Service hosted a 2-day interagency endangered species symposium for the purpose of formulating a better understanding of agencies' missions to foster interagency cooperative management for endangered species.
July 1	U.S. Fish and Wildlife Service and the National Marine Fisheries Service, *Interagency Cooperative Policy for the Ecosystem Approach to the Endangered Species Act*, incorporated ecosystem considerations in Endangered Species Act actions. In part, the agencies are to use the authorities of the act to develop clear, consistent policies that integrate the mandates of federal, state, tribal, and local governments to prevent species endangerment by protecting, conserving, restoring, or rehabilitating ecosystems that are important for conservation of biodiversity.
Aug. 8	Deputy Under Secretary of Defense (Environmental Security) policy statement, *Implementation of Ecosystem Management in the DOD*, states that ecosystem management will become the basis for future management of DOD lands and waters. The policy statement identifies five key

	elements for ecosystem management, including developing coordinated approaches.
Sept. 28	Interagency memorandum of understanding, *Implementation of the Endangered Species Act*, signed by 14 federal agencies to establish a general framework for cooperation and participation in the exercise of each agency's responsibility under the act. The memorandum expired in September 1999.
1995	
June	Interagency Ecosystem Management Task Force report, *The Ecosystem Approach: Healthy Ecosystems and Sustainable Economies Report— Vol. I*, describes the ecosystem approach and identifies key crosscutting issues relevant to its implementation, including understanding what the ecosystem approach is. Specifically, the approach emphasizes improving coordination among federal agencies and forming partnerships between federal, state, tribal, and local governments; private landowners; and other stakeholders.
Sept.	Interagency Ecosystem Management Task Force report, *The Ecosystem Approach: Healthy Ecosystems and Sustainable Economies Report— Vol. II Implementation Issues*, describes major issue areas that influence the effectiveness of the ecosystem approach and made recommendations for improvements.
Dec. 15	Interagency *Memorandum of Understanding to Foster the Ecosystem Approach*, signed by 14 federal agencies, carries out an Interagency Ecosystem Management Task Force report recommendation that member agencies enter into an agreement to provide leadership in and cooperation with activities that foster the ecosystem approach. The memorandum expired in September 1999.
1996	DOD and The Nature Conservancy, *Conserving Biodiversity on Military Lands: A Handbook for Natural Resources Managers*, promotes ecosystem and regional management approaches on military installations.
Jan. 23	Keystone Center, *Keystone Center Policy Dialogue on a Department of Defense Biodiversity Management Strategy*, was developed by representatives from DOD, other government agencies, and nongovernmental interests to develop policy guidance for enhancing and protecting DOD lands in a way that is integrated with the military mission. The report covers three aspects of biodiversity conservation, including

	(1) the policy framework for DOD's biodiversity and suggestions for clarifying and improving current policies and programs, and for integrating mission planning and biodiversity conservation; (2) principles and steps of a model process for biodiversity conservation on DOD installations and describes the regional context in which biodiversity occurs; and (3) measures of success that can be used to monitor diversity conservation in the context of military readiness at the installation level to support decision making at policy levels.
Feb. 24	DOD Directive 4715.1, *Environmental Security*, establishes the Defense Environmental Security Council and requires the designation of a military department to serve as an executive agent for environmental coordination in each of the 10 Environmental Protection Agency federal regions.
May 3	DOD Instruction 4715.2, *Regional Environmental Coordination*, implements policy, assigns responsibilities, and prescribes procedures under DOD Directive 4715.1 by establishing DOD Regional Environmental Coordinators.
May 3	DOD Instruction 4715.3, *Environmental Conservation Program*, implements policy and prescribes procedures under DOD Directive 4715.1 for, among other things, the integrated management of natural and cultural resources on property under DOD control; establishes the DOD conservation committee; defines ecosystem management as an approach realized through effective partnerships; states that in ecosystem management policy all interested parties (federal, state, tribal, and local governments; nongovernmental organizations; private organizations; and the public) should collaborate in developing a shared vision of what constitutes desirable future ecosystem conditions for the region of concern; and instructs installations to meet regularly with regional stakeholders.
July	Air Force, Army, Navy Tri-Service Committee, *Partnering Guide for Environmental Missions of the Air Force, Army, Navy*, developed by a tri-service committee under sponsorship of DOD to describe ways in which partnering could be used in the environmental programs of the three services.
1998	
Sept.	Departments of Defense, the Interior, and Agriculture memorandum of understanding, *Cooperation and Coordination of the Use and Management of Lands and Resources*, establishes the Interagency Military

	Land Use Coordination Committee to improve interagency communication and coordination on matters of mutual interest. Subsequently, the Department of Energy, Department of Transportation, and General Services Administration joined the committee.
1999	U.S. Fish and Wildlife Service, *Fiscal Year 1999-2000 Director's Priorities: Ecosystem Approach*, identifies specific actions plans and dates to implement ecosystem management.
May 17	DOD and U.S. Fish and Wildlife Service memorandum of understanding, *Ecosystem-based Management of Fish, Wildlife, and Plant Resources on Military Lands*, establishes a policy of cooperation and coordination between the agencies for the effective and efficient management of fish, wildlife, and plant resources on military lands.
Aug. 18	U.S. Fish and Wildlife Service memo, *Guidelines for Ecosystem Teams*, guides service personnel in their implementation of an ecosystem approach. Defined as a comprehensive approach to conservation and to embrace partnerships outside the agency.
2001	
Feb. 22	U.S. Fish and Wildlife Service, National Marine Fisheries Service, and Environmental Protection Agency memorandum of agreement, *Enhanced Coordination Under the Clean Water Act and Endangered Species Act*, to enhance coordination between the agencies to best carry out their responsibilities under the Clean Water Act and Endangered Species Act.
Aug. 28	DOD, *Endangered Species Action Plan* (Draft), provides an overview and analysis of its endangered species encroachment issue, along with potential strategies and action concepts for consideration by DOD decision makers.
2002	
April 2	National Military Fish and Wildlife Association, *Endangered Species Program Talking Points*, states that successful recovery planning and implementation depends on building support and participation by federal, state, and local agencies; tribal governments; researchers; conservation organizations; private landowners; and individuals. Cooperation and coordination among all parties is essential to effective recovery programs.

Aug.	Army Environmental Policy Institute, *Department of Defense Ecosystem Management Policy Evaluation*, provides insights into the level of ecosystem management implemented across the military services. Recommendations include that the military services move closer to the goal of the DOD Instruction 4715.3, where ecosystem management principals, such as cooperative management, become not just special projects, but rather where they form the basis for decision making at the installation level.
Sept.	Interagency Military Land Use Coordination Committee, draft *Interagency Handbook for the Joint Stewardship of Withdrawn or Permitted Federal Lands Used by the Military* states that the common interest in the stewardship of these lands forms the basis for innovative interagency efforts to develop coordination mechanisms and procedures for accomplishing the stewardship of natural and cultural resources.
Sept.	U.S. Department of Agriculture, *Strategic Plan for FY2002-2007*, identifies five major programmatic policies, including protecting and enhancing the nation's natural resource base and environment.
Oct. 17	Navy Instruction 5090.1B, *Navy Environmental and Natural Resources Program Manual*, establishes Navy policy to incorporate ecosystems management as the basis for planning and managing Navy installations.
2003	
Jan. 10	DOD Directive 3200.15, *Sustainment Of Ranges And Operating Areas (OPREA)*, establishes policy and assigns responsibilities for the sustainment of test and training ranges, and states that DOD should enter into cooperative agreements and partnerships with other federal agencies to sustain training ranges by, among other things, managing for endangered species. It also directs that the services promote inter- and intra-service coordination of sustainment-management issues and institute multi-tiered (e.g., national, regional, and local) coordination and outreach programs that promote sustainment of ranges and operating areas and resolution of encroachment issues. Also, to improve communications, the services should enter into cooperative agreements and partnerships with other federal agencies, state, tribal, and local governments, and with non-governmental organizations with expertise or interest in DOD ranges, operating areas, and airspace to further sustainment objectives.
Feb.	U.S. Department of the Interior, *Draft Revised Strategic Plan for FY 2003-2008*, defines the Secretary's vision of conservation through

	cooperation, consultation, and communication. The department relies on three key tools, including partnerships, to meet its strategic goals and accomplish its mission. Through an increasing number of partnership efforts, the department will continue to reduce the threat from invasive species and strive to protect habitat that supports threatened, endangered, and other native species.
April 29	The U.S. Geological Survey, responding to a request from the U.S. Fish and Wildlife Service and Department of Defense Endangered Species Roundtable, hosted a two-day forum focused on the science of threatened species, endangered species, and at-risk species. The forum attempted to develop a more effective approach to identify and share information; coordinate research and monitoring; and facilitate the development of more effective strategies and plans to address research and development.

Appendix III: Comments from the Department of Defense

OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

ACQUISITION, TECHNOLOGY AND LOGISTICS

SEP 0 5 2003

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

Dear Mr. Holman:

This is the Department of Defense (DoD) response to the GAO draft report, GAO-03-976, "MILITARY TRAINING: Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges," dated July 29, 2003 (GAO Code 350268).

In general, the DoD concurs with both the general findings and the specific recommendations in this draft report. We are enclosing our responses to the three GAO recommendations and the item for Congressional consideration, as well as several technical comments.

Our primary action officer is Mr. Peter Boice, (703) 604-0524.

Sincerely,

Patrick J. Meehan, Jr.
Acting Assistant Deputy Under Secretary of Defense
(Environment)

Enclosures

Note: Page numbers in the draft report may differ from those in this report.

GAO DRAFT REPORT 03-976 DATED JULY 29, 2003
(GAO CODE 350268)

"MILITARY TRAINING: IMPLEMENTATION STRATEGY NEEDED TO INCREASE INTERAGENCY MANAGEMENT FOR ENDANGERED SPECIES AFFECTING TRAINING RANGES"

DEPARTMENT OF DEFENSE COMMENTS ON THE RECOMMENDATIONS

RECOMMENDATION 1: The GAO recommended that the Secretaries of Defense, the Interior, and Agriculture jointly develop and implement an interagency strategy that includes a systematic methodology to identify opportunities for cooperative management efforts, funding sources, and goals and criteria to measure success. (Page 27/Draft Report).

DoD RESPONSE: Concur with recommendation 1. Currently, all of the military departments are members of the Interagency Military Land Use Coordination Committee (IMLUCC) created in 1996 to improve and maintain interagency communication and coordination on matters of mutual interests to the Departments of Defense, Interior, Agriculture and Transportation. The existing IMLUCC coordinating structure and process could be used to develop the interagency strategy and methodology.

RECOMMENDATION 2: The GAO recommended that the Secretaries of Defense, the Interior, and Agriculture jointly develop an education program to train federal land managers to identify opportunities for interagency cooperation. (Page 27/Draft Report).

DoD RESPONSE: Concur with recommendation 2. Suggest rewording the recommendation to read: "Develop a comprehensive training program for federal land managers (both senior executives, on-the-ground staff, and regional officers) to identify and implement opportunities for interagency cooperation;" *Rationale* – The text of the report uses the term "training," not "education." Education implies a long-term, comprehensive series of courses, whereas the draft report implies that a series of individual training courses (for different types of employees, with different levels of control) is what is needed to address the interagency cooperation question. In many cases, this type of training could become a part of existing courses. The IMLUCC could develop an interagency education/training strategy and identify the organization best suited to develop and implement the recommended program.

RECOMMENDATION 3: The GAO recommended that the Secretaries of Defense, the Interior, and Agriculture jointly create a centralized information source on cooperative management efforts that includes elements such as lessons learned, best practices, and agency contacts for federal land managers. (Page 27/Draft Report).

DoD RESPONSE: Concur with recommendation 3. The IMLUCC could serve as the focal point to identify a centralized information management organization such as the Defense Environmental Network and Information Exchange (DENIX) that could implement a centralized information management source. DENIX already performs centralized information management functions for the Department of Defense.

Appendix IV: Comments from the Department of the Interior

United States Department of the Interior

OFFICE OF THE ASSISTANT SECRETARY
POLICY, MANAGEMENT AND BUDGET
Washington, D.C. 20240

SEP 10 2003

Mr. Barry T. Hill
Director, Natural Resources and Environment
U.S. General Accounting Office
441 G Street, N.W.
Washington, D.C. 20548

Dear Mr. Hill:

Thank you for providing the Department of the Interior the opportunity to review and comment on the draft U.S. General Accounting Office report entitled, "*Military Training: Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges,*" (GAO-03-976), dated July 29, 2003.

Although we generally concur with the findings in the report, the level of coordination and cooperation between Department of the Interior land management agencies and the Department of Defense is more extensive than the findings indicate. Further, our agencies are continually working to improve and expand interagency coordination and cooperation.

We have concerns with the report's recommendations which include the implementation of an interagency strategy, educational programs, and a centralized data source for cooperative management efforts. While these recommendations could help link conservation efforts among the Departments and produce better information for land managers to deal with endangered species issues, they are likely to create increased demands on already strained resources. GAO's proposal that Congress consider requiring agencies to report on their efforts to manage cooperatively for endangered species affecting military training ranges would impose an additional burden that may not achieve the intended result, and would divert resources from higher priority conservation activities.

The Department recommends that the draft GAO report include a more comprehensive view of the military training facilities' current interagency cooperation for management of federally-listed species and their contributions to the recovery of these species, as indicated in the enclosure. These ongoing cooperative efforts evolved over time as a result of long standing relationships developed through the interagency consultation process, and a genuine effort on the part of these

Mr. Barry T. Hill page 2

military installations to use their authorities to carry out programs for the conservation of endangered and threatened species. We recommend that the report acknowledges that interagency cooperative efforts are considerable, given budget constraints.

The enclosure provides specific comments from the U.S. Fish and Wildlife Service and the Bureau of Land Management. We hope that these comments will assist you in preparing the final report.

Sincerely,

P. Lynn Scarlett
Assistant Secretary -
Policy, Management and Budget

Enclosure

Appendix V: Comments from the Department of Agriculture

United States Department of Agriculture | Forest Service | Washington Office | 14th & Independence SW, P.O. Box 96090, Washington, DC 20090-6090

File Code: 2670/1420
Date: SEP 0 5 2003

Mr. Mark Little
Assistant Director in Defense Capabilities and Management
U. S. Government Accounting Office
Washington, DC 20548

Dear Mr. Little:

Thank you for the opportunity to provide comments on the draft report entitled "Military Training: Implementation Strategy Needed to Increase Interagency Management for Endangered Species Affecting Training Ranges (GAO-03-976)." Our comments are included in the enclosure. We trust these comments will be useful to you during development of a final GAO report on this topic. We strongly support interagency cooperation in managing to recover threatened and endangered species populations and the ecosystems upon which they depend. We will continue to look for and take advantage of more opportunities to cooperate with the Department of Defense and other federal agencies in this effort.

Sincerely,

DALE N. BOSWORTH
Chief

Enclosure

Caring for the Land and Serving People

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