



June 2016

# MILITARY TRAINING

## DOD Met Annual Reporting Requirements in Its 2016 Sustainable Ranges Report

## Why GAO Did This Study

DOD relies on its training ranges within the United States and overseas to help prepare its forces for combat and complex missions around the globe.

Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 required DOD to submit a comprehensive plan on its efforts to address training constraints caused by limitations on the use of military lands, airspace, and marine areas in the United States and overseas for training. The act, as amended, further requires DOD to provide annual progress reports on its efforts through 2018. The act also included a provision for GAO to submit annual evaluations of DOD's reports. This report assesses the extent to which DOD's 2016 Sustainable Ranges Report met statutory reporting requirements.

To conduct this work, GAO reviewed DOD's 2016 report and compared it with the statutory reporting requirements. GAO also obtained written responses from cognizant DOD and military service officials regarding preparations made to complete the 2016 report.

## What GAO Recommends

GAO is not making recommendations in this report. DOD agreed with GAO's report after reviewing the draft.

View [GAO-16-627](#). For more information, contact Brian Lepore at (202) 512-4523 or [leporeb@gao.gov](mailto:leporeb@gao.gov).

## MILITARY TRAINING

### DOD Met Annual Reporting Requirements in Its 2016 Sustainable Ranges Report

## What GAO Found

The Department of Defense's (DOD) 2016 Sustainable Ranges Report met the annual statutory reporting requirements to describe DOD's progress in implementing its plan to sustain training ranges and any additional actions taken or planned for addressing training constraints caused by limitations on the use of military lands, marine areas, and airspace. DOD's 2016 report provides updates to the plan required by the act, specifically: (1) proposals to enhance training range capabilities and address any shortfalls, (2) goals and milestones to describe DOD's progress in implementing its comprehensive training range sustainment plan, and (3) projected funding requirements for each of the military services to implement their planned actions. In the report, DOD used goals and milestones to address the statutory requirement to describe its progress in implementing its comprehensive training range sustainment plan. Using these goals as a common framework, each military service developed its own milestones and needed actions for reaching those milestones. The report also identifies evolving activities and emerging issues related to training range sustainability and includes actions taken to mitigate them.

In updates pertaining to military services' issues related to range capability, the report noted that the Marine Corps has lacked the capability to fully exercise a large Marine Air-Ground Task Force in a realistic training scenario. For example, the report states that the Marine Corps Air Ground Combat Center Twentynine Palms, California, has not been able to accommodate a full-scale, live-fire Marine Expeditionary Brigade exercise. However, according to DOD's 2016 report, the ongoing expansion of the center will correct this training and readiness deficiency, and significantly enhance the Marine Corps' ability to conduct training in support of U.S. national security.

## Military Training Exercise



Source: Defense Video and Imagery Distribution System. | GAO-16-627

Marines conduct a raid on a simulated hostile village during a training exercise at Marine Corps Air Ground Combat Center Twentynine Palms, California.

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# Contents

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## Letter

|  |   |
|--|---|
| Background   | 3 |
| DOD's 2016 Sustainable Ranges Report Met the Annual Reporting Requirements | 4 |
| Agency Comments  | 9 |

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## Appendix I

|                                       |    |
|---------------------------------------|----|
| GAO Contact and Staff Acknowledgments | 12 |
|---------------------------------------|----|

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## Related GAO Products

13

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## Figure

|                                      |   |
|--------------------------------------|---|
| Figure 1: Military Training Exercise | 6 |
|--------------------------------------|---|

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June 15, 2016

## Congressional Committees

The Department of Defense (DOD) relies on access to military lands, marine areas, and airspace to provide its forces with a realistic training environment. Its training ranges within the United States and overseas help prepare forces to face combat and complex missions around the globe. As DOD seeks to provide training on its ranges to sustain military readiness, challenges related to range capabilities and encroachment continue to grow, new challenges emerge, and dynamic conditions and events exacerbate existing challenges.<sup>1</sup> According to DOD's 2016 Sustainable Ranges Report, range capability challenges include insufficient resources and outdated equipment and systems that require updates in order to complete current training requirements.<sup>2</sup> In addition, the military services continue to face encroachment challenges such as incompatible development and land use adjacent to DOD training activities, to include foreign investment located in proximity to military training areas, as well as renewable energy development; effects related to the reallocation of electromagnetic spectrum<sup>3</sup> as a result of the National Broadband Plan;<sup>4</sup> and effects related to climate change. Further, DOD's 2016 Sustainable Ranges Report states that the implementation of the Budget Control Act of 2011 continues to affect DOD and the military

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<sup>1</sup>DOD defines range "encroachment" as external, as well as internal, DOD factors and influences that constrain or have the potential to inhibit the full access or operational use of the live training and test domain. Examples include, but are not limited to, endangered species and critical habitat, unexploded ordnance and munitions, radio frequency spectrum, maritime or airspace restrictions, air quality, airborne noise, urban growth, physical obstructions, and renewable energy projects.

<sup>2</sup>Department of Defense, *DOD's 2016 Report to Congress on Sustainable Ranges*, (Mar. 15, 2016).

<sup>3</sup>Electromagnetic spectrum is defined as the range of frequencies of electromagnetic radiation from zero to infinity. According to DOD officials, it includes visible light, microwave, radio, and infrared wave lengths.

<sup>4</sup>In 2009, Congress enacted the American Recovery and Reinvestment Act, which directs the Federal Communications Commission to develop a National Broadband Plan for greater transparency in spectrum allocation and utilization over the next decade. In response to the act and the President's Broadband Initiative, the National Telecommunications and Information Administration has identified several potential radio frequency bands for reallocation and auction for broadband services which, according to DOD officials, includes bands currently used by DOD.

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services through changes in force structure and significant reductions in funding for operations and maintenance, military construction, and research and development investments, as well as acquisition programs.<sup>5</sup> DOD's report also states that these limitations affect training range capabilities. To work within these limits and increase the long-term sustainability of its military range resources, DOD has launched a number of efforts aimed at both preserving its training ranges and addressing the effects of its training activities on the environment and on local communities through the issuance of policy, the establishment of programs, and proactive partnering at the federal, state, and local levels.

Section 366 of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 required DOD to submit to Congress, at the same time as the President submitted his budget for fiscal year 2004, a comprehensive plan for using existing authorities available to the department to address training constraints caused by limitations on the use of military lands, marine areas, and airspace in the United States and overseas.<sup>6</sup> Further, section 366, as amended, requires the Secretary of Defense to submit an annual progress report to Congress through fiscal year 2018 at the same time as the President's budget. Since 2004, DOD has submitted an annual Sustainable Ranges Report to address these requirements. Additionally, the act includes a provision for us to submit annual evaluations of DOD's reports to Congress within 90 days of receiving these reports from DOD.<sup>7</sup> This report assesses the extent to which DOD met the statutory reporting requirements for its 2016 Sustainable Ranges Report. This is our thirteenth annual review of DOD's Sustainable Ranges Report.

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<sup>5</sup>The Budget Control Act of 2011, Pub. L. No. 112-25 (2011), as amended by the Bipartisan Budget Act of 2015, Pub. L. No. 114-74 (2015), imposes discretionary spending limits for fiscal years 2012 to 2025 to reduce projected spending by about \$1 trillion. As with other agencies, DOD's appropriations may be affected by the discretionary spending limits.

<sup>6</sup>Pub. L. No. 107-314, § 366 (2002) Section 366 originally required reports for fiscal years 2005 through 2008. However, this requirement was extended through 2013 by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007, Pub. L. No. 109-364, § 348 (2006), and extended through 2018 by section 311 of the National Defense Authorization Act for Fiscal Year 2013, Pub. L. No. 112-239, § 311 (2013).

<sup>7</sup>Section 366 originally required GAO to submit its report to Congress within 60 days of receiving the original report from DOD, but this was extended to 90 days by section 348 of the John Warner National Defense Authorization Act for Fiscal Year 2007. Pub. L. No. 109-364, § 348 (2006).

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To determine whether DOD's 2016 Sustainable Ranges Report met the statutory reporting requirements specified in section 366(a) of the Bob Stump National Defense Authorization Act for Fiscal Year 2003 (as amended), we reviewed the report and compared it with the statutory requirements contained in section 366, as amended. We also compared the 2016 and 2015 reports to determine what changes, if any, DOD made since its last Sustainable Ranges Report. We also reviewed the memorandum that the Office of the Secretary of Defense sent to the military services to request data for the 2016 and 2015 Sustainable Ranges Reports to determine what differences, if any, there were in the types of information that were requested from each of the military services. Finally, we obtained responses from officials of the Office of the Deputy Assistant Secretary of Defense for Force Education and Training and from the military services on changes, if any, to the services' submission of information on training ranges to DOD for its 2016 report and any challenges DOD faced in preparing the report. The intent of our review was not to comprehensively evaluate the data presented in DOD's 2016 Sustainable Ranges Report, but rather to determine the extent to which the report met mandated statutory requirements and whether DOD faced challenges in preparing its report.

We conducted this performance audit from March 2016 to June 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

DOD has reported to Congress since fiscal year 2004 on several items related to its training ranges in response to section 366(a) of the Bob Stump National Defense Authorization Act for Fiscal Year 2003. The act as subsequently amended required annual progress reports to be submitted at the same time as the President submitted the administration's annual budget for fiscal years 2005 through 2018. The provision that we evaluate the plans submitted pursuant to section 366(a) within 90 days of receiving the report from DOD has also been extended through fiscal year 2018.

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In our prior reviews of DOD's Sustainable Ranges Reports, we found that DOD did not address certain required elements when it initially submitted its comprehensive plan in 2004.<sup>8</sup> Further, we noted that it took DOD some time to develop a plan consistent with the basic requirements of section 366. Over time, we found that as DOD reported annually on its progress in implementing its comprehensive plan, it continued to improve its Sustainable Ranges Reports, and it has reported on the actions it has taken in response to prior GAO recommendations. Specifically, in 2013, we reported that DOD had implemented all 13 of the recommendations we had made since 2004 for expanding and improving DOD's reporting on sustainable ranges.<sup>9</sup> Further, DOD has progressed from using four common goals and milestones to using seven shared goals for which the services have developed their own actions and milestones that are tailored to their missions. We have reported that these new goals and milestones are more quantifiable and now are associated with identified time frames.<sup>10</sup>

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## DOD's 2016 Sustainable Ranges Report Met the Annual Reporting Requirements

DOD's 2016 Sustainable Ranges Report met the annual statutory reporting requirements to describe DOD's progress in implementing its sustainable ranges plan and any actions taken or to be taken in addressing constraints caused by limitations on the use of military lands, marine areas, and airspace. In its 2016 report, DOD provided updates to the plan that were required by the act. These updates included: (1) proposals to enhance training range capabilities and address any shortfalls in current resources, (2) goals and milestones for tracking planned actions and measuring progress in the implementation of its training range sustainment plan, and (3) projected funding requirements for implementing its planned actions.

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<sup>8</sup>See Related GAO Products page at the end of this report.

<sup>9</sup>GAO, *Military Training: DOD Met Annual Reporting Requirements and Continued to Improve Its Sustainable Ranges Report*, [GAO-13-648](#) (Washington, D.C.: July 9, 2013).

<sup>10</sup>GAO, *Military Training: DOD Met Annual Reporting Requirements for Its 2014 Sustainable Ranges Report*, [GAO-14-517](#) (Washington, D.C.: May 9, 2014).

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## DOD Reported Proposals to Enhance Range Capabilities and Address Shortfalls

In our review of DOD's 2016 Sustainable Ranges Report, we found that, as required by statute, DOD reported on its proposals to enhance training range capabilities and address any shortfalls in resources. DOD developed these proposals by evaluating current and future training range requirements and the ability of current DOD resources to meet these requirements. In its 2016 report, DOD revalidated its 2015 individual range capability and encroachment assessments and the current and future military service training range requirements.<sup>11</sup> To do so, DOD updated the report sections pertaining to each military service's issues related to range capability, encroachment, and special interests to the military service. For instance, regarding the Marine Corps, the report noted, among other things, that the Marine Corps has lacked the capability to fully exercise a large Marine Air-Ground Task Force in a realistic, doctrinally appropriate training scenario. The report cited as an example that the Marine Corps Air Ground Combat Center Twentynine Palms, California, has not been able to accommodate a full-scale, live-fire Marine Expeditionary Brigade exercise. The ongoing expansion of the center, the report noted, will correct this training and readiness deficiency, and significantly enhance the Marine Corps' ability to conduct training in support of U.S. national security objectives. Specifically, the report cited the airspace proposal and land acquisition currently underway, stating that the use of the land for training will phase in over the next several years, as policies and procedures are put in place to manage the land. The report further stated that the first large-scale exercise on the newly-acquired lands is planned for August 2016. Figure 1 shows Marines conducting a raid on a simulated hostile village during a training exercise.

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<sup>11</sup>Beginning with its 2013 Sustainable Ranges Report, DOD began conducting full range capability and encroachment assessments every 3 years rather than annually, and to validate those assessments in the years between evaluations. DOD's analysis of range capability and encroachment data over the preceding 10 years had found that there were not significant changes in the data from year to year, and the military services had confirmed this finding. DOD completed its full range capability and encroachment assessment in 2015, so the next planned full range capability and encroachment assessment is to be included in DOD's 2018 Sustainable Ranges Report.



**Figure 1: Military Training Exercise**



Source: Defense Video and Imagery Distribution System. | GAO-16-627

Marines conduct a raid on a simulated hostile village during a training exercise at Marine Corps Air Ground Combat Center Twentynine Palms, California.

In its 2016 report, DOD also reported on eight evolving activities and emerging issues, seven of which were reported in its 2015 report, related to training and training ranges. These eight activities and issues are: (1) new sustainable ranges initiative-related influences and actions,<sup>12</sup> (2) budget reductions impacting range capability, (3) foreign investment and national security, (4) threatened and endangered and candidate species, (5) demand for electromagnetic spectrum, (6) continued growth in domestic use of unmanned aerial systems, (7) early coordination with renewable energy industry, and (8) offshore oil and gas development. DOD's 2016 report outlines some actions being taken to mitigate the challenges these issues may present for DOD test and training ranges. For example, in DOD's 2016 report, these actions include the publishing of two new DOD instructions that outline DOD policies, responsibilities,

<sup>12</sup>See DOD Instruction 3200.16, *Operational Range Clearance (ORC)* (Apr. 21, 2015); DOD Instruction 3200.21, *Sustaining Access to the Live Training Domain* (Sept. 15, 2015) (incorporating change 1, Nov. 4, 2015). This was the first time "new sustainable ranges initiative-related influences and actions" was included in a DOD Sustainable Ranges Report.

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and procedures for DOD encroachment planning and the preservation of the long-term use of its training ranges.

In regard to the third activity—foreign investment and national security—in an April 2016 report,<sup>13</sup> we evaluated the extent to which DOD made progress in its efforts to assess the national security risks and effects of foreign encroachment. In that review, we found that DOD has made limited progress in addressing foreign encroachment on federally managed land since we last reported in December 2014.<sup>14</sup> We also found that DOD has begun to take some steps toward assessing the national security risks and effects of foreign encroachment, but has not yet fully implemented the recommendations from our December 2014 report, which were: (1) that DOD should develop and implement guidance for conducting a risk assessment on foreign encroachment and (2) that DOD should collaborate with other federal agencies to obtain additional information on transactions near ranges. DOD concurred with both recommendations. In its 2016 Sustainable Ranges Report, DOD stated that it is pursuing opportunities to obtain information related to foreign investment and transactions in proximity to DOD activities from agencies with land and airspace management authority. Specifically, the report states that DOD and the Bureau of Ocean Energy Management have initiated a pilot project to develop a process that will provide information regarding transactions near submerged lands of the outer continental shelf. DOD reported that it is also considering legislative relief as an avenue to mitigate national security-related encroachment and has engaged the various federal land managers to expound on potential issues related to DOD concerns. In addition, according to the report, DOD is developing guidance to plan and conduct a risk assessment of testing and training ranges and installations to assess vulnerabilities and potential impacts from foreign investment in response to our first recommendation in our 2014 report on foreign encroachment.

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<sup>13</sup>GAO, *Defense Infrastructure: DOD Has Made Limited Progress in Assessing Foreign Encroachment Risks on Federally Managed Land*, [GAO-16-381R](#) (Washington, D.C.: Apr. 13, 2016).

<sup>14</sup>GAO, *Defense Infrastructure: Risk Assessment Needed to Identify If Foreign Encroachment Threatens Test and Training Ranges*, [GAO-15-149](#) (Washington, D.C.: Dec. 16, 2014).

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## DOD Used Goals and Milestones to Describe Its Progress in Implementing Its Comprehensive Training Range Sustainment Plan

In its 2016 Sustainable Ranges Report, DOD used goals and milestones to address the statutory requirement to describe its progress in implementing its comprehensive training range sustainment plan. DOD has seven goals in support of this plan: (1) mitigate encroachment pressures on training activities from competing operating space, (2) mitigate electromagnetic spectrum competition, (3) meet military airspace challenges, (4) manage increasing military demand for range space, (5) address impacts from new energy infrastructure and renewable energy impacts, (6) anticipate climate change impacts,<sup>15</sup> and (7) sustain excellence in environmental stewardship.

Using these goals as a common framework, each military service has developed its own milestones and needed actions for reaching those milestones. In DOD's 2016 Sustainable Ranges Report, each service provided updates to its milestones and actions. The report included the following examples:

- The Army has ongoing actions to develop an environmental assessment process to facilitate increased access to restricted airspace in support of unmanned aircraft system training.
- The Navy has ongoing actions to analyze and assess electromagnetic spectrum issues potentially impacting training capabilities at the range complex and regional level.
- The Marine Corps has ongoing actions to define future requirements for land ranges and other areas to support training, current and projected land shortfalls, and possible courses of action to mitigate shortfalls at range complex, regional, and service levels.
- The Air Force has ongoing actions to initiate and develop a comprehensive analysis of all the current Air Force missions, airspace, and ranges within specific Federal Aviation Administration Air Traffic Control Centers in order to determine if the requirements to meet new missions and to support current operations are met.

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<sup>15</sup>We have reported our findings related to certain limits on the use of some training ranges and limitations on accessibility of the ranges due to climate change effects. For more information see GAO, *Climate Change Adaptation: DOD Can Improve Infrastructure Planning and Processes to Better Account for Potential Impacts*, [GAO-14-446](#) (Washington, D.C.: May 30, 2014).

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## DOD Reported Its Projected Funding Requirements for Implementing Planned Actions

In the 2016 Sustainable Ranges Report, DOD met the statutory requirement to track its progress in implementing the comprehensive plan by identifying the funding requirements needed to accomplish its goals. DOD delineated four funding categories to be used by the services to project their range sustainment efforts: (1) modernization and investment, (2) operations and maintenance, (3) environmental, and (4) encroachment. The funding requirements section of the 2016 report includes descriptions and specific examples for each funding category, as well as requested funding levels for fiscal years 2016 through 2020. For example, the environmental category is described as funding dedicated to environmental management of ranges, including range assessments, response actions, and natural and cultural resource management planning and implementation. Specific examples of environmental funding include conducting range assessments and environmental mitigation costs associated with range modernization and range construction. This section also provides an explanation of any fluctuations occurring over the 5-year funding period covered in the report. For example, the Army's requested funding for the modernization and investment category fluctuated from \$75 million in fiscal year 2016 to \$44.8 million in fiscal year 2018 to \$112.4 million in fiscal year 2020. The Army attributes this fluctuation to planned force structure reductions that will result in range modernization plans being updated.

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## Agency Comments

We are not making recommendations in this report. We provided a draft of this report to DOD for comment. In its response, DOD stated that it agrees with the report and has no technical comments to provide.

We are sending copies of this report to the appropriate congressional committees; the Secretary of Defense; the Secretaries of the Army, Navy, and Air Force, and Commandant of the Marine Corps; and the Deputy Assistant Secretary of Defense for Force Education and Training. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

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If you or your staff have any questions concerning this report, please contact me at (202) 512-4523 or [leporeb@gao.gov](mailto:leporeb@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in the appendix.



Brian J. Lepore  
Director, Defense Capabilities and Management

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# Appendix I: GAO Contact and Staff Acknowledgments

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## Staff Acknowledgments

In addition to the contact named above, Maria Storts (Assistant Director), Pamela Davidson, Shahrzad Nikoo, Erik Wilkins-McKee, and Barbara Wooten made key contributions to this report.

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# Related GAO Products

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*Defense Infrastructure: DOD Has Made Limited Progress in Assessing Foreign Encroachment Risks on Federally Managed Land.* [GAO-16-381R](#). Washington, D.C.: April 13, 2016.

*Military Training: DOD's Annual Sustainable Ranges Report Addressed Statutory Reporting Requirements.* [GAO-15-537](#). Washington, D.C.: June 17, 2015.

*Defense Infrastructure: Risk Assessment Needed to Identify If Foreign Encroachment Threatens Test and Training Ranges.* [GAO-15-149](#). Washington, D.C.: December 16, 2014.

*Climate Change Adaptation: DOD Can Improve Infrastructure Planning and Processes to Better Account for Potential Impacts.* [GAO-14-446](#). Washington D.C.: May 30, 2014.

*Military Training: DOD Met Annual Reporting Requirements for Its 2014 Sustainable Ranges Report.* [GAO-14-517](#). Washington, D.C.: May 9, 2014.

*Military Training: DOD Met Annual Reporting Requirements and Continued to Improve Its Sustainable Ranges Report.* [GAO-13-648](#). Washington, D.C.: July 9, 2013.

*Military Training: DOD Met Annual Reporting Requirements and Improved Its Sustainable Ranges Report.* [GAO-12-879R](#). Washington, D.C.: September 12, 2012.

*Military Training: DOD's Report on the Sustainability of Training Ranges Meets Annual Reporting Requirements but Could Be Improved.* [GAO-12-13R](#). Washington, D.C.: October 19, 2011.

*Military Training: DOD Continues to Improve Its Report on the Sustainability of Training Ranges.* [GAO-10-977R](#). Washington, D.C.: September 14, 2010.

*Military Training: DOD's Report on the Sustainability of Training Ranges Addresses Most of the Congressional Reporting Requirements and Continues to Improve with Each Annual Update.* [GAO-10-103R](#). Washington, D.C.: October 27, 2009.



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*Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan.* [GAO-09-128R](#). Washington, D.C.: December 15, 2008.

*Military Training: Compliance with Environmental Laws Affects Some Training Activities, but DOD Has Not Made a Sound Business Case for Additional Environmental Exemptions.* [GAO-08-407](#). Washington, D.C.: March 7, 2008.

*Improvement Continues in DOD's Reporting on Sustainable Ranges, but Opportunities Exist to Improve Its Range Assessments and Comprehensive Plan.* [GAO-08-10R](#). Washington, D.C.: October 11, 2007.

*Improvement Continues in DOD's Reporting on Sustainable Ranges but Additional Time Is Needed to Fully Implement Key Initiatives.* [GAO-06-725R](#). Washington, D.C.: June 20, 2006.

*Military Training: Funding Requests for Joint Urban Operations Training and Facilities Should Be Based on Sound Strategy and Requirements.* [GAO-06-193](#). Washington, D.C.: December 8, 2005.

*Some Improvements Have Been Made in DOD's Annual Training Range Reporting but It Still Fails to Fully Address Congressional Requirements.* [GAO-06-29R](#). Washington, D.C.: October 25, 2005.

*Military Training: Actions Needed to Enhance DOD's Program to Transform Joint Training.* [GAO-05-548](#). Washington, D.C.: June 21, 2005.

*Military Training: Better Planning and Funding Priority Needed to Improve Conditions of Military Training Ranges.* [GAO-05-534](#). Washington, D.C.: June 10, 2005.

*Military Training: DOD Report on Training Ranges Does Not Fully Address Congressional Reporting Requirements.* [GAO-04-608](#). Washington, D.C.: June 4, 2004.

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

*Military Training: DOD Approach to Managing Encroachment on Training Ranges Still Evolving.* [GAO-03-621T](#). Washington, D.C.: April 2, 2003.

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

*Military Training: DOD Needs a Comprehensive Plan to Manage Encroachment on Training Ranges.* [GAO-02-727T](#). Washington, D.C.: May 16, 2002.

*Military Training: Limitations Exist Overseas but Are Not Reflected in Readiness Reporting.* [GAO-02-525](#). Washington, D.C.: April 30, 2002.

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