

# **Defense Infrastructure**

DoD Environmental Community Involvement Programs at Test and Training Ranges (D-2002-122)

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#### Acronyms

ACWA Assembled Chemical Weapons Assessment

AFB Air Force Base

BNL Brookhaven National Laboratory
OSD Office of the Secretary of Defense

PMCD Program Manager for Chemical Demilitarization

POIO Public Outreach and Information Office



#### INSPECTOR GENERAL DEPARTMENT OF DEFENSE 400 ARMY NAVY DRIVE ARLINGTON, VIRGINIA 22202–4704

June 28, 2002

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE FOR PERSONNEL
AND READINESS
DEPUTY UNDER SECRETARY OF DEFENSE
(INSTALLATIONS AND ENVIRONMENT)
DIRECTOR OF OPERATIONAL TEST AND
EVALUATION

SUBJECT: Evaluation Report on DoD Environmental Community Involvement Programs at Test and Training Ranges (Report No. D-2002-122)

We are providing this report for review and comment. We considered management comments on the draft of this report when preparing the final report.

DoD Directive 7650.3 requires that all recommendations be resolved promptly. As a result of management comments, we revised Recommendation 3. to delete subparts a. through d. We request that the Deputy Under Secretary of Defense (Readiness) provide comments on actions taken or planned and completion dates of actions on all recommendations by August 27, 2002.

We appreciate the courtesies extended to the staff. For additional information on this report, please contact Mr. William C. Gallagher at (703) 604-9270 (DSN 664-9270) (wgallagher@dodig.osd.mil) or Mr. Michael R. Herbaugh at (703) 604-9294 (DSN 664-9294) (mherbaugh@dodig.osd.mil). See Appendix E for the report distribution. Team members are listed inside the back cover.

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Acting Assistant Inspector General

for Auditing

#### Office of the Inspector General of the Department of Defense

Report No. D-2002-122 June 28, 2002

(Project No. D2001CB-0186.000)

# **DoD Environmental Community Involvement Programs at Test and Training Ranges**

### **Executive Summary**

Who Should Read This Report and Why? This report should be of interest to operational personnel at DoD test and training ranges and to others concerned with the sustainability of DoD test and training ranges. Incomplete community involvement programs put test and training ranges at risk for training disruption.

**Background.** This evaluation was requested by the Office of the Deputy Under Secretary of Defense (Readiness) and the Director of Operational Test and Evaluation to evaluate the effectiveness of DoD environmental community outreach programs relative to encroachment challenges at DoD test and training ranges. Members of Congress have expressed concerns that encroachment issues, such as urban development, civilian air traffic, and fierce competition for radio frequencies, are among the factors that constrain full use of test and training ranges, negatively impacting military preparedness and safety.

Based on recommendations from the Office of the Secretary of Defense and Service headquarters, we visited four DoD test and training ranges.

Results. To enhance test and training range sustainability, DoD needs to improve community involvement efforts at the ranges. Encroachment caused by external factors is an increasing threat to the ability of test and training ranges to carry out live fire testing and training operations. Community involvement in the decisionmaking process at test and training ranges can help range officials make cost-effective decisions on encroachment issues. However, community involvement efforts at the four DoD test and training ranges visited lacked the necessary elements for a comprehensive program or were disjointed. As a result, test and training ranges have an increased risk for environmental civil liability, negative impacts on operations and military readiness, and strained relations with local communities. To improve community involvement programs and practices, DoD needed to publish guidance on community involvement programs and establish an advocacy office for the community involvement function. (See the Finding section of the report for the detailed recommendations.)

Test and training ranges have conducted some noteworthy community involvement efforts. These efforts, which we have identified as best management practices, could be adapted for use at any range in support of a community involvement program. See Appendix D for details on best management practices.

Management Comments and Evaluation Response. The Deputy Under Secretary of Defense (Readiness), Deputy Under Secretary of Defense (Installations and Environment), and Director of Operational Test and Evaluation jointly concurred with the finding and the intent of all the recommendations. They agreed to establish policy and guidance for community involvement programs. They requested that we revise the recommendation concerning establishing a community involvement function in the Office of the Deputy Under Secretary of Defense (Readiness) until the overarching integrated product team completes its work and decides on the responsibility and location of the community involvement function. We revised the recommendation accordingly. Because the comments did not provide specific corrective actions or completion dates for the actions, we request additional comments on the final report by August 27, 2002.

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## **Background**

This evaluation was requested by the Office of the Deputy Under Secretary of Defense (Readiness) and the Director of Operational Test and Evaluation to evaluate the effectiveness of DoD environmental community outreach programs relative to encroachment challenges at DoD test and training ranges.

Community Involvement. DoD uses the term "outreach" for dealing with military issues involving the public. Discussions with stakeholders revealed that the term "outreach" conveys one-way communication from the ranges to the community. However, stakeholders were more responsive to the term "community involvement," which indicates open, ongoing, two-way communication between DoD and stakeholders. Community involvement incorporates an element of community outreach, which is the dissemination of information to educate and inform the public about various activities at the test and training range. For purposes of this report, the term "community outreach" was expanded to "community involvement."

**Stakeholders.** A stakeholder is anyone who is affected by, has an interest in, or has the ability to influence the outcome of encroachment issues. Stakeholders include individuals and groups in the surrounding communities, any current and future landowners, local or national activist groups, and regulatory agencies, as well as the media.

**Encroachment.** The Deputy Under Secretary of Defense (Installations and Environment) stated that encroachment is any pressure, both internal and external to test and training ranges, that affects the ability to carry out live testing and training. Encroachment caused by external factors is an increasing threat to military readiness. DoD recognized that encroachment issues were important after local community concerns threatened to interrupt, interrupted, and/or terminated the testing and training activities at ranges on the island of Vieques in Puerto Rico, at Massachusetts Military Reservation, at Makua Valley Military Reservation in Hawaii, and at Farallon de Medinilla in the Pacific Ocean.

One-Way Communication. The Federal Government has traditionally provided information to the public in a "decide, announce, defend" fashion. Stakeholder opinions may be solicited, but are often requested late in the decisionmaking process after agencies have concluded investigatory work. In addition, Federal agencies do not always include local government decisionmakers early enough to ensure that local officials can identify issues of concern.

Range Sustainability. Military ranges are crucial tools in testing weapon systems and training personnel. Sustaining the ranges for future testing and training is essential to meet the fundamental responsibility of ensuring adequately tested equipment and adequately trained personnel. To accomplish range sustainability, DoD is developing plans and draft directives that will

promote management and use of DoD ranges and airspace in a manner to support national security objectives and maintain the high state of readiness essential to the U.S. military. In addition, the newly developed policies will ensure long-term viability of DoD ranges while at the same time protecting human health and the environment.

Senior Readiness Oversight Council. The Senior Readiness Oversight Council is made up of DoD senior leaders who meet monthly to review significant readiness topics. In June 2000, the Senior Readiness Oversight Council determined that DoD should have a comprehensive and coordinated approach to address range sustainability issues. The Senior Readiness Oversight Council tasked the Defense Test and Training Steering Group to analyze encroachment issues and develop a comprehensive action plan to address them. The Defense Test and Training Steering Group identified nine encroachment issues for range sustainability. See Appendix B for a description of each issue:

- endangered species,
- unexploded ordnance and other constituents,
- frequency encroachment,
- maritime sustainability,
- national airspace system,
- air quality,
- airborne noise,
- urban growth, and
- outreach.

The Defense Test and Training Steering Group formed the joint Office of Secretary of Defense and Services Sustainable Ranges Working Group to address each issue. The Office of Secretary of Defense and Services Sustainable Ranges Working Group worked with existing DoD boards and committees populated by subject matter experts in the other eight issues. The outreach subgroup developed a draft Sustainable Ranges Outreach Plan and is drafting a DoD outreach directive.

Congressional Concerns. In letters to the Secretary of Defense dated March and October 2001, members of Congress stated that urban development, civilian air traffic, and fierce competition for radio frequencies are among the factors that constrain full use of test and training ranges. Additionally, the members stated that Service branches and training functions are not immune to encroachment issues. Encroachment issues are of increasing concern and have a negative impact on military preparedness and safety.

In a memorandum dated December 4, 2001, the Deputy Secretary of Defense directed the Under Secretary of Defense for Personnel and Readiness, the Deputy Under Secretary of Defense (Installations and Environment), the Director of Operational Test and Evaluation, and the Military Departments to form an integrated product team to serve as the Pentagon's coordinating body for encroachment issues that relate to the sustainability of military test and training ranges. The integrated product team was established in December 2001. Two levels of the integrated product team membership have been structured to respond to the December 4, 2001, Deputy Secretary of Defense direction. The overarching integrated product team, comprised of flag-level and Senior Executive Service members, reports to the Deputy Secretary. Supporting the overarching integrated product team is the working integrated product team whose membership includes mid-level Office of the Secretary of Defense and Service members. The overarching and the working integrated product teams meet on an as-required basis, approximately monthly. Additionally, a rapid response team that includes a number of overarching and working integrated product team members was formed to coordinate time-sensitive activities associated with the readiness and ranges preservation initiative.

## **Objectives**

Our objective was to evaluate the effectiveness of DoD environmental community outreach programs relative to encroachment challenges at DoD test and training ranges. Specifically, we assessed best management practices that encourage successful environmental community relationships as a tool for achieving sustainable test and training ranges. We also reviewed the management control program as it related to the overall objective. See Appendix A for a discussion of the evaluation scope and methodology, prior coverage, and the review of the management control program.

## **DoD Community Involvement Programs**

Community involvement efforts at DoD test and training ranges visited lacked the necessary elements for a comprehensive program or were disjointed. DoD has recognized outreach and encroachment as critical issues of range sustainability and has developed draft policy and guidance. Although the proposed policy and guidance may lead to improvements, they are incomplete because they do not contain the essential elements for a comprehensive community involvement program. In addition, DoD has not established a functional proponent for community involvement. As a result, test and training ranges have an increased risk for environmental civil liability, negative impacts on operations and military readiness, and strained relations with local communities.

### **Cultural Shift**

Over the last 60 years, drastic cultural, societal, and informational changes have occurred that have had a profound impact on communication strategies between Federal agencies and the public. In the 1940s and 1950s, the public's perception of the military was one of credibility and trustworthiness. Information was provided by the military to the public with one-way communication. At that time, experts who interpreted technical information worked for the Federal Government. Between the 1960s and the 1980s, the public became more skeptical of military decisions. New laws were created to require procedural public involvement for specific environmental issues. Representatives of the Federal Government met with the public to provide information in a "decide, announce, defend" manner. However, with a proliferation of access to information, Americans increasingly demand open, transparent, and inclusive processes for determining what is important for them. The Federal Government can no longer provide the public with information in a "decide, announce, defend" manner. Community actions from around the nation have demonstrated that involving communities early and often in the decisionmaking process enables public stakeholders to help agencies make cost-effective decisions.

## **Elements for Community Involvement Programs**

DoD is beginning to recognize the need for involving stakeholders in dealing with encroachment issues, and is currently seeking ways to improve those relationships. We visited four sites within DoD and two sites outside of DoD to evaluate community involvement programs. Of the sites evaluated, best management programs were observed at Eglin Air Force Base, Brookhaven National Laboratory, the American Chemistry Council, and Program Manager for Chemical Demilitarization. See Appendix C for a detailed discussion of each program.

Analyses of best management programs highlighted the elements necessary for a comprehensive community involvement program.

**Stakeholder Involvement.** Active engagement of all stakeholders in the decisionmaking process is critical because it allows for stakeholder support of the missions of test and training ranges.

**Senior Management Commitment.** A sustained and visible senior-level management commitment to community involvement is necessary to build and maintain partnerships with the affected communities.

**Single Point of Contact.** Ranges and installations should clarify functional responsibilities for disseminating information on range issues to the local community, internal audiences, and media outlets on environmental, training, testing, and natural resource matters, issues, concerns, and successes. A point of contact should support all the facets of a range's community involvement program and should act as the range spokesperson on all environmental, testing, and training issues. In addition, when appropriate, this point of contact should communicate and coordinate with the installation community involvement/public affairs office.

**Site-Specific Implementation Plans.** Site-specific implementation plans serve as the blueprint for public involvement activities. Using general guidance, test and training ranges should tailor the plan to the specific needs of the various stakeholders.

**Resources.** Community involvement is a vital part of the mission for test and training ranges, and requires a sustained commitment of funding and staffing, even during times of budget constraints.

**Accountability.** Accountability includes clearly defined roles and responsibilities within job descriptions and in the annual performance appraisals for employees at all levels, including range commanders and where appropriate the installation commander.

**Training.** Range personnel should be prepared to deal with the public by understanding the specific community at hand and completing communication training. Because the technical issues vary dramatically among ranges, range personnel should provide training for stakeholders. Training programs should orient stakeholders to missions and include an overview of policies and practices, along with the range budget and procurement processes. Training programs should also highlight transient issues, such as changes in range commanders and how often the changes occur.

**Performance Metrics.** Defining measurable objectives and tracking a range's progress toward meeting these objectives are important steps in a strategy for meeting the mission. DoD must develop and use qualitative and quantitative measures of effectiveness to assess the program's impacts. These measures can include feedback from dialogue forums, public opinion surveys, meetings with identified stakeholders, or tabulating the number of formal complaints filed against DoD.

## **Test and Training Range Efforts**

Test and training ranges have identified the importance of effective stakeholder relationships, and have begun to implement various levels of community involvement. However, community involvement efforts at the four DoD test and training ranges visited lacked the necessary elements for a comprehensive program or were disjointed. DoD has not identified the number of test and training ranges. The following results are based upon four site visits to test and training ranges that were recommended by the Office of the Secretary of Defense (OSD) and Service officials as having comprehensive community involvement programs.

Lack of Necessary Elements. The four DoD test and training ranges visited did not implement all of the elements necessary for a comprehensive community involvement program. Analyses of community involvement programs at the test and training ranges visited revealed that five of the eight elements were frequently lacking in their community involvement programs. Two sites lacked the elements of senior management commitment to community involvement, dedicated resources, and training for range officials dealing with community and encroachment issues. In addition, three sites lacked the elements of either accountability or performance metrics, or both, for community involvement programs.

Although the ranges implemented some community involvement efforts, most of the efforts did not go beyond restoration. Community involvement efforts at two sites were focused on cleanup activities rather than working with communities to establish partnerships and proactively address encroachment issues. As a result, community involvement efforts at DoD test and training ranges were incomplete.

**Disjointed Efforts.** Community involvement efforts conducted on one DoD test and training range were disjointed, resulting in uncoordinated efforts between ranges and tenant organizations. The range had outreach efforts in place, including a restoration advisory board that involved community members, public tours of facilities, and a Sound Level Management Program to manage noise levels projected into the community. However, there was no central point of contact to coordinate the community involvement efforts. Additionally, communication between the tenant and range public affairs offices was minimal. As a result, stakeholders did not have a single point of contact to discuss issues or obtain information.

**Best Practices.** Test and training ranges have conducted some noteworthy community involvement efforts in addition to those focused on restoration. These efforts, which we have identified as best management practices, could be adapted for use at any range in support of a community involvement program. The best practices include:

- establishment of an Encroachment Committee.
- establishment of a Citizens Advisory Technical Team,
- implementation of a Sound Level Management Program, and
- development of an installation leader's guide for public participation.

See Appendix D for details on best management practices.

## **Policy and Guidance**

DoD test and training ranges were not provided adequate guidance to develop comprehensive community involvement programs. No DoD policies or environmental laws discuss the essential elements of a comprehensive community involvement program.

Existing Policy. DoD and Service policies do not incorporate all of the elements necessary for a comprehensive community involvement program. The most comprehensive DoD policy that currently exists is DoD Directive 5410.18, "Public Affairs Community Relations Policy," November 20, 2001; however, DoD Directive 5410.18 focuses on establishing authority and assigning responsibilities for public affairs offices. These responsibilities are concentrated on promotional events that provide one-way communication and do not address community involvement elements.

Environmental Laws Requiring Community Involvement. Environmental laws exist that require community involvement to varying degrees. Many of the existing laws and acts require public feedback or comments regarding environmental issues. Although these laws involve the public with environmental actions, the laws do not address a comprehensive community involvement program.

**Draft Directive.** The outreach working group, formed by the Defense Test and Training Steering Group, has been developing an outreach directive, "Coordination and Outreach for Sustainable Ranges and Operating Areas," since September 2001. The purpose of the directive is to establish policy and assign responsibilities for implementing community involvement. The directive will support sustainable management of ranges and operating areas within DoD. The directive will require national, regional, and local coordination for community involvement programs to promote sustainable range management and encroachment issue resolution. The directive will also require community involvement programs to include strategy, implementation mechanisms, and performance metrics.

**Draft Sustainable Ranges Outreach Plan.** DoD hired SRS Technologies, a contractor, in August 2000 to begin drafting the Sustainable Ranges Outreach Plan to gain support for military testing and training. The purpose of the Sustainable Ranges Outreach Plan is to build trust and confidence among DoD, regulators, and key stakeholders on issues that relate to sustainable range operations. The primary themes of the plan include maintaining two-way communication with the public and coordinating community involvement efforts among government bodies. The goals of the plan are to:

- build and maintain effective working relationships with key internal and external stakeholders to increase public support for sustaining test and training ranges;
- ensure the public understands the need for DoD to test and train, and the critical connection between readiness and range access;
- increase DoD understanding of the types of impact on communities from DoD testing and training actions; and
- build confidence that DoD is equipped, trained, and ready to respond to activity around the globe, while at the same time conveying that the response capability is perishable and must be reinforced with testing and training.

Analysis of Draft Policy and Guidance. Although the draft directive and plan may lead to improvements, the policy and guidance are incomplete because they do not contain the essential elements for a comprehensive community involvement program. The policy being drafted by the outreach working group incorporates all the elements for national level programs; however, the policy does not adequately address local level community involvement. The policy does not incorporate:

- senior management commitment by holding the range commander accountable for community involvement;
- a single point of contact at ranges to coordinate community involvement programs;
- resources for planning, programming, and budgeting at all levels to support a comprehensive community involvement program;
- accountability by establishing roles and responsibilities to hold range personnel responsible for community involvement; and
- training programs for range personnel who are required to conduct two-way community involvement.

The discussion of elements within the policy should be broad enough to allow test and training ranges to tailor community involvement programs to meet individual needs.

The draft Sustainable Range Outreach Plan is very broad in scope and discusses responsibilities for OSD, regional, and local level community outreach. However, the plan does not discuss site-specific implementation plans, performance metrics, or a single point of contact, which are necessary for a comprehensive community involvement program.

Discussions with stakeholders have indicated that there are different understandings of the terms "outreach" and "encroachment." DoD draft policy should replace the term "outreach" with "community involvement" and provide definitions for the terms "community involvement" and "encroachment." The definition of "encroachment" should include encroachment on the range by the public and encroachment on the public by the range. Providing definitions would encourage a mutual understanding of encroachment issues.

## **OSD-Level Functional Proponent**

DoD has not established a community involvement function at the OSD level for test and training ranges. Encroachment challenges for DoD ranges point to the need for developing and maintaining dedicated community involvement. A community involvement function would provide leadership for implementing community involvement programs at test and training ranges to proactively address encroachment issues. A community involvement function would:

- coordinate stakeholder involvement programs by drawing on the expertise from operations, engineering, legal, acquisition, and public affairs communities;
- coordinate with Services and other Federal, state, tribal, and local agencies on encroachment issues;
- provide consultation and training across DoD to identify and address potential and actual encroachment issues; and
- provide expert advice to policy development in these areas.

An OSD-level community involvement function to support range issues would provide consistent implementation and coordination of stakeholder involvement across the Services. Facilitating partnerships with stakeholders would greatly improve the relationship and credibility of DoD with Congress, other Federal agencies, regulators, and the public.

#### **Mission Risks**

As a result of DoD not establishing and implementing a comprehensive policy and guidance for community involvement, DoD test and training ranges are at an increased risk for environmental civil liability, negative impacts on operations and military readiness, and strained relations with local communities. For example, several news articles have reported that events centered on

stakeholder concerns at Farallon de Medinilla, Makua Valley Military Reservation, the island of Vieques, and Massachusetts Military Reservation have threatened to limit, limited, or terminated tests and training at those ranges.

Environmental Civil Liability. An ongoing environmental lawsuit is threatening to suspend military training on the Pacific Island of Farallon de Medinilla. Environmentalists are seeking an injunction to stop military live-fire training on the island until valid permits are obtained by the military. The group contends that the military is violating the Migratory Bird Treaty Act by using the island for training and bomb drops, which they say kill or harm nesting migratory birds. Military officials state that Farallon de Medinilla is crucial to military training because the only other similar training ranges that exist in the Pacific Ocean are under the control of foreign governments.

Additionally, a lawsuit between a Hawaiian environmental group, Malama Makua, and the Army halted training at Makua Valley Military Reservation between 1998 and 2001. The lawsuit was based on the arguments by Malama Makua that live-fire military training had adverse risks on native Hawaiian cultural resources. A settlement was agreed upon in October 2001 that required the Army to conduct a comprehensive environmental impact statement exploring the risks to cultural and environmental resources on the reservation. The Army agreed to limit testing to no more than 37 live-fire exercises within the next 3 years. After the third year, no training will be permitted at Makua Valley Military Reservation until the environmental impact statement is complete.

The Army has used Makua Valley Military Reservation for training since the 1920s. Until training was halted in 1998, the Army's 25<sup>th</sup> Infantry Division trained companies of 150 troops. Since then, the number of training exercises has declined 75 percent, forcing troops to travel as far as Thailand and Fort Polk, Louisiana, to train.

Negative Impacts on Operations. Although DoD has downsized over the past decade, requirements for test and training ranges have not decreased in proportion to overall force reductions. Current weapons systems have significantly greater capabilities and operating ranges than DoD legacy weapons systems. For example, modern air combat capabilities and tactics require up to three times the training area than was required 20 years ago. Increasing capabilities and greater dependence on use of electronic combat and communications systems drive the need for more range space, and realistic testing and training with modern weapons require larger safety buffer areas around ranges. However, the limits on tests and training because of encroachment issues threaten the long-term sustainable use of DoD test and training ranges.

The Navy trained on the Puerto Rican island of Culebra, where there was heavy protesting against the training. In the early 1970s, the Navy shifted the training performed on Culebra to the island of Vieques. After protests by local communities, the Navy agreed to reduce environmental destruction on Vieques and signed a memorandum of understanding in 1983. The Navy did not follow the intent of the memorandum and increased training during the 1990s. The Navy did not involve the local communities in the decisionmaking process to

increase training. Residents of Puerto Rico and Vieques protested the training. As a result, the FY 2002 Defense Authorization Act states that the Navy plans to discontinue using Vieques no later than May 1, 2003, or until a suitable alternative can be identified. According to a study by the Center for Naval Analyses, there is no single site available to the Navy that can accommodate all aspects of weapons training and military exercises that are required of carrier battle groups before overseas deployment.

Strained Community Relations. Stakeholders perceive that government officials treat their requests for information as burdensome and a mission impediment rather than as a right of citizenship. This was evident at Massachusetts Military Reservation, where military officials did not address public concerns, resulting in the lack of a trusting relationship between the installation and the public. The lack of community involvement resulted in distrust and lack of confidence in the military operations at Massachusetts Military Reservation. Massachusetts Military Reservation has since initiated a community involvement program in an attempt to rebuild the lost public trust and confidence.

**At-Risk Methodology.** DoD has not identified test and training ranges that are at risk for encroachment issues. We believe that DoD needs to identify ranges at risk in order to effectively address encroachment impacts on their mission. The U.S. Army Construction Engineering Research Laboratory has initiated the development of a model to identify urban growth encroachment issues at Army installations; however, we believe that other models need to be developed to encompass all issues that put DoD test and training ranges at risk for encroachment.

#### Conclusion

Today's military must build effective relationships with stakeholders inside and outside range boundaries, while shifting historic mindsets to be flexible, open, and inclusive of political, social, and economic values that are important to stakeholders. DoD uses the word "outreach" when dealing with local communities and writing draft policy; however, local communities and stakeholders consider outreach as one-directional communication. Using the term "community involvement" would convey to the public a positive willingness by DoD to have two-way communication. Community involvement programs at DoD test and training ranges lacked the elements for a comprehensive community involvement program or were disjointed. Incomplete community involvement programs put DoD ranges at risk for training disruption. Comprehensive community involvement programs should include the essential elements, but be tailored for the local level. DoD has also not established a community involvement function to proactively address encroachment issues and oversee implementation of community involvement programs at test and training ranges.

# Recommendations, Management Comments, and Evaluation Response

**Revised Recommendations.** As a result of management comments, we revised Recommendation 3. to allow the overarching integrated product team to evaluate this issue and provide a recommendation regarding the full responsibilities and location of a community involvement function.

We recommend that the Under Secretary of Defense for Personnel and Readiness, the Deputy Under Secretary of Defense (Installations and Environment), and the Director of Operational Test and Evaluation jointly develop and implement a structured approach to proactively address encroachment issues at test and training ranges that includes:

- 1. Publication of comprehensive policy and guidance for the development and implementation of community involvement programs at test and training ranges. Policy and guidance should reflect senior management commitment to and accountability for community involvement, and require:
- a. Incorporation of stakeholder input into community involvement programs.
- b. Designation of a single point of contact for range and encroachment issues in the community.
- c. Implementation of site-specific plans that detail roles and responsibilities in carrying out community involvement, outline community involvement activities, and address encroachment issues.
- d. Planning, programming, and budgeting of resources at all levels to support comprehensive community involvement programs.
- e. Development of training programs for range personnel and stakeholders to orient them to specific community involvement issues and range missions, respectively.
- f. Establishment of performance metrics for community involvement objectives and development of a program to measure progress.
- 2. The concept of community involvement and definition of the terms:
- a. "Community involvement" to encompass information dissemination to educate and inform stakeholders and encourage open, ongoing, two-way communication with stakeholders.
- b. "Encroachment" to reflect both internal and external factors that may impair the military mission.

# 3. Establishment of a community involvement function to advocate and coordinate DoD community involvement issues.

Management Comments. In a combined response of the Deputy Under Secretary of Defense (Readiness), the Deputy Under Secretary of Defense (Installations and Environment), and the Director of Operational Test and Evaluation concurred with the recommendations. They stated that Recommendation 3. was too specific and premature. They believe the overarching integrated product team should evaluate the issue and provide a recommendation regarding the full responsibilities and location of a community involvement function in the Office of the Deputy Secretary of Defense.

**Evaluation Response.** Although they jointly concurred with the recommendations, they did not provide corrective actions or completion dates for corrective actions. Therefore, we request they provide additional comments in response to the final report.

# **Appendix A. Scope and Methodology**

## **Scope**

**Work Performed.** We reviewed community involvement policy at the OSD-level, Service Headquarters, and four test and training ranges. We studied and analyzed DoD, Service, and installation level policies and procedures and national environmental laws and acts related to community involvement. We also relied on published research, literature, and Congressional transcripts. The documents we reviewed were dated from July 1974 through February 2002.

We evaluated the effectiveness of community involvement programs relative to encroachment challenges at DoD test and training ranges. During site visits within DoD, other Federal agencies, and private industry, we identified best management programs from which we developed the eight elements for a comprehensive community involvement program. We used the eight elements to determine the effectiveness of community involvement programs at Naval Air Warfare Center, Aircraft Division, Patuxent River; Aberdeen Proving Ground; Marine Corps Base, Quantico; and Eglin Air Force Base. We also identified best management practices that encourage successful community relationships. We visited the Department of Energy's Brookhaven National Laboratory (BNL) and the American Chemistry Council for research and review of comprehensive community involvement programs outside of DoD. We did not evaluate test and training ranges outside of the continental United States.

General Accounting Office High-Risk Area. The General Accounting Office has identified several high-risk areas in the DoD. This report provides coverage of the Defense Infrastructure Management high-risk area.

## Methodology

Use of Computer-Processed Data. We did not use computer-processed data to perform this evaluation.

**Universe and Sample.** DoD has not identified the total number of test and training ranges. Based on recommendations from OSD and Service headquarters, we selected and visited four DoD test and training ranges.

**Evaluation Dates and Standards.** We performed this evaluation from August 2001 through April 2002 in accordance with standards as implemented by the Inspector General of the Department of Defense. Accordingly, we included tests of management controls as necessary.

Contacts During the Evaluation. We visited or contacted individuals and organizations within DoD and at the Department of Energy, the American Chemistry Council, the Center for Public Environmental Oversight, and the Keystone Center. Further details are available upon request.

## **Management Control Program Review**

DoD Directive 5010.38, "Management Control (MC) Program," August 26, 1996, and DoD Instruction 5010.40, "Management Control (MC) Program Procedures," August 28, 1996, require DoD organizations to implement a comprehensive system of management controls that provides reasonable assurance that programs are operating as intended and to evaluate the adequacy of the controls.

Scope of the Review of the Management Control Program. We reviewed the adequacy of the management control programs for the implementation and coordination of community involvement programs at DoD test and training ranges. We also reviewed management's self-evaluation applicable to those controls.

Adequacy of Management Controls. We identified material management control weaknesses for the DoD test and training ranges as defined by DoD Instruction 5010.40. DoD test and training range management controls over community involvement implementation and coordination were not sufficient to ensure that the range was not at risk for environmental civil liability, negative impacts on operations and military readiness, and strained community relations. If management implements all recommendations, the implementation and coordination of community involvement programs at DoD test and training ranges will improve. A copy of the report will be provided to the senior official responsible for management controls in the Office of the Under Secretary of Defense for Personnel and Readiness.

**Adequacy of Management's Self-Evaluation.** DoD test and training officials did not identify the implementation and coordination of community involvement programs as an assessable unit and, therefore, did not identify or report the material management control weaknesses identified by the evaluation.

## **Prior Coverage**

Unrestricted General Accounting Office reports can be accessed on the Internet at <a href="http://www.gao.gov">http://www.gao.gov</a>.

## **General Accounting Office**

GAO Report No. GAO-02-614, "Military Training: DoD Lacks a Comprehensive Plan to Manage Encroachment on Training Ranges," June 11, 2002.

## **Appendix B. Encroachment Issues**

**Endangered Species.** Military lands provide habitat for over 300 Federally listed threatened or endangered species that must be protected under the Endangered Species Act. Protection of endangered species by increased land use restrictions reduces DoD flexibility to use designated ranges for testing and training.

**Unexploded Ordnance and Other Constituents.** Live-fire test and training is the cornerstone for readiness. The application of environmental statutes to unexploded ordnance and munitions on active ranges could cause the disruption or termination of live-fire training in order to conduct cleanup investigations and restoration.

**Frequency Encroachment.** Weapon system testing relies heavily on the use of radio spectrum. The growth of consumer communications devices has resulted in pressure from the telecommunications industry for the reallocation of radio spectrum from Government to non-Government. Some of the reallocations have resulted in operating restrictions at specific range locations, while other reallocations have resulted in the complete loss of access to specific frequency bands by the DoD.

Maritime Sustainability. Regulatory compliance is a common issue affecting the ability of U.S. Armed Forces to conduct operations, training exercises, or testing in the marine environment. Regulatory agencies apply a "precautionary approach" to the management of protected resources when DoD activities are involved. This approach requires a regulator to assume that the proposed DoD activity will harm the environment. DoD must prove that an action has no potential harm to the environment. This practice results in unsupportable and unnecessary restrictions on mission-essential training.

**National Airspace System.** As a result of deregulation and relatively affordable fares, the civilian airline industry has grown steadily. This factor, along with the population growth in areas that were once desolate, has caused airspace encroachment on military ranges. DoD airspace is necessary to conduct critical testing of equipment and training of aircrews.

Air Quality. The Clean Air Act includes two elements that cause serious encroachment problems: opacity and conformity. Opacity measures the visibility of air emissions, and opacity limits can restrict or prohibit smoke training and the use of intentional burns. Conformity requires DoD to analyze emissions for any new or significant change in range operations. If an increase in emissions cannot be offset or accommodated, the Clean Air Act prohibits the new or changed activity.

**Airborne Noise.** Airborne noise is noise from military weapon systems that travel through the air, not under water. The central issue of airborne noise is the impact, or perceived impact, on people, animals, structures, and land use. Compliance with noise-related laws and Congressional, regional, state, and community pressures often result in restrictions and/or reductions to military training.

**Urban Growth.** The DoD maintains over 38,000 square miles of training, testing, and facility lands. The continued availability of these resources is critical for the maintenance of force readiness and power projection capability. As communities grow closer to the boundaries of ranges and installations, land use incompatibilities emerge. These incompatibilities can compromise the health, safety, and welfare of both military and civilians, and often cause the loss of military operational efficiency, operational capacity, and future mission capability.

# **Appendix C. Best Management Programs**

## Eglin Air Force Base, Florida

Senior Management Commitment. The Commander, Air Armament Center at Eglin Air Force Base (AFB) published an environmental policy that includes dedication to community involvement. The Center Commander participates in annual meetings to discuss issues and gain feedback from both local and state political figures. For example, the Governor's Senior Leadership Forum brings together military commanders from throughout the state of Florida semi-annually with the Governor of Florida to discuss concerns of a nature where the state might provide assistance. This personal interface has opened up the lines of communication with the Governor, his staff, and all state agencies. The Center Commander, along with senior management, also meets quarterly with mayors of local communities for a Mayors' Breakfast. This evidence of senior management commitment has been instrumental in helping to develop community tactical and strategic plans.

**Partnerships**. Eglin AFB has developed partnerships that allow officials to contribute to key planning organizations within the state of Florida while maximizing opportunities for mutual growth. Eglin AFB provides substantial assistance to community planners in order to proactively help shape future land development and associated transportation, water, and utility improvements. Partnerships with local communities have also enabled Eglin AFB to obtain over 4,000 hours of volunteer assistance annually for environmental programs.

**Performance Metrics.** Eglin AFB established the Executive Management Information System, which is a base-wide planning mechanism for tracking performance measures. This system is available to managers to track progress of all activity conducted on Eglin AFB, including outdoor recreation and prescribed burning. Eglin AFB is currently developing performance metrics for community involvement.

Environmental Public Affairs Officer. Eglin AFB established an Environmental Management Directorate within the Air Armament Center, which was tasked with environmental stewardship and compliance. Within this directorate, an Environmental Public Affairs Office was established to manage environmental public affairs activities for Eglin AFB. The Environmental Public Affairs Officer, who reports to the Director of the Environmental Management Directorate, plans and directs all aspects of environmental public affairs related to Eglin AFB, and oversees environmental public affairs plans and policies for the Air Armament Center. The Environmental Public Affairs Officer, along with the base public affairs office, are required to complete risk communication training in order to effectively deal with the public. The Eglin AFB environmental program office stated that Eglin AFB has included the Environmental Public Affairs Office in the annual budget, allotting resources specifically for environmental community involvement issues.

**Resources.** According to the Eglin AFB environmental program office, the Environmental Management Directorate budgets approximately \$70,000 annually for community involvement programs. These programs encompass everything from educational efforts and public meetings to compliance with environmental legal requirements. The Environmental Public Affairs Officer oversees one part-time contractor, who is active in community involvement activities such as writing articles and providing tours to local media.

## **Brookhaven National Laboratory**

BNL is a Government-owned, contractor-operated Department of Energy facility located in Long Island, New York. The Department of Energy has established a community involvement policy, which is the basis for the community involvement program at BNL. The Director, BNL has documented his commitment to community involvement, and has illustrated this commitment by interacting with the community and overseeing the implementation of community involvement at BNL.

**Employee Responsibility.** The responsibility for community involvement at BNL lies with BNL managers and is included in their performance requirements and ratings. Additionally, BNL requires all managers that interact with the public on behalf of the Laboratory to be appropriately trained by community involvement managers.

Community Relations Office. BNL has established a Community, Education, Government, and Public Affairs Office. The Community Relations Office within this directorate is responsible for community involvement and outreach activities that include:

- managing programs that build relationships and disseminate information about the BNL science mission with key stakeholders;
- maintaining a required training program for all BNL managers in approaches to community involvement and laboratory decisionmaking;
- maintaining an issue/interest anticipation process to forecast developments within the community that could have an impact for BNL;
   and
- managing a community involvement process that ensures line manager responsibility for community involvement activities.

Community Advisory Council. BNL has established a Community Advisory Council, which involves stakeholders in the decisionmaking process at BNL. The Community Advisory Council meets monthly to discuss initiatives at BNL and provide advice to the Director of BNL. By establishing the Community Advisory Council and allowing community members to set the agenda for the

meetings, BNL management has displayed the commitment to community involvement necessary for a successful program. BNL has implemented ideas presented by the community members. When ideas are not implemented, BNL has provided feedback to the community as to why the ideas were not implemented.

Management Controls. BNL requires program managers to complete quarterly self-assessments of programs in order to enhance existing programs. The Manager of Community Relations compiles the quarterly reports into an annual summary, which is given to BNL senior management and the Department of Energy. An outside party annually conducts a peer review to evaluate the overall program at BNL. This review is based solely on performance metrics and includes the self-assessments conducted throughout the year.

Benefits of Community Involvement. Personnel at BNL stated that good community relations build public confidence and trust in operations. The Community Relations Manager stated that the community involvement program helps BNL invest a minimum amount of time and resources defending itself against environmental groups and elected officials. Rather than facing the strong possibility of continued funding loss from community complaints, BNL has used communications, community involvement, and relationship-building as tools to build trust with different public groups and communicate its mission in a more precise and strategic way.

**Resources.** BNL personnel stated that the Community Relations Office has adequate resources to meet requirements. When faced with budget constraints, the Community Relations Office has given the stakeholders and community members an opportunity to give input into which community involvement activities should be conducted.

**Department of Energy.** The Department of Energy established a foundation for community involvement programs at the local level with the implementation of the public participation policy. The Department of Energy also formed a Public and Consumer Affairs Office within the headquarters office that was eliminated during the first year of its existence due to a restructuring of the Department of Energy headquarters. The former director of the Office stated that an office at the Secretariat level enforced consistent implementation of community involvement. The office should act as a coordinating body for lessons learned and information sharing, but should not have direct authority over local sites. In addition, the former director recommended that a high-level career person direct the office in order to achieve stability in the implementation of policies and procedures.

## **American Chemistry Council**

The American Chemistry Council (the Council) represents the 190 companies engaged in the chemical industry. Its bylaws obligate member companies to ascribe to guiding principles, and to make good faith efforts to implement the program elements of the Responsible Care® program. The Council and its member companies are committed to an improved environmental, health, and safety performance through common sense advocacy designed to address major

public policy issues, health and environmental research, product testing, and the Responsible Care® program. The Responsible Care® program instituted guidance for ethical ways the chemistry industry can benefit society, the environment, and the economy, and promotes an open, ongoing dialogue with employees and the community.

**Principles.** Responsible Care<sup>®</sup> is built on six codes of management practices that help companies continually improve their performance in health, safety, and the environment. Each member company must adhere to the six Codes of Management Practices.

- Community Awareness and Emergency Response
- Pollution Prevention
- Process Safety
- Distribution
- Employee Health and Safety
- Product Stewardship

The community awareness and emergency response code requires a community involvement component that will communicate program activities and performance under all the codes of management practices and will promote an open, ongoing dialogue with employees and the community.

**Performance Evaluation.** Member companies submit annual reports on their progress in implementing each code. In addition, each member company must establish company-specific goals to be publicly reported each year in order to measure individual progress. These self-evaluations provide a measure of company progress and are a valuable management tool for the Council and individual companies in directing assistance efforts. This process also provides a mechanism for the Council to monitor the general implementation progress of members.

Verification Process. The management systems verification process assists Council members in the implementation of the Responsible Care® program. The process provides participating companies with an external view of the effectiveness of their management systems for carrying out Responsible Care®, and helps demonstrate the companies' commitment to implementation of Responsible Care® to both internal and external stakeholders. Teams consisting of industry peers, a facilitator, and members of the public interview company officials, conduct facility tours, review company information, and interview commercial and other stakeholders to gather information about the company. The teams meet and interview senior staff and determine if systems are in place to drive continuous performance improvement and sustain Responsible Care® excellence. At the conclusion of the process, the team prepares a report identifying the company's strengths and opportunities for improvement.

**Training.** Initially, member companies felt uncomfortable communicating with the public and chief executive officers were reluctant to implement Responsible Care<sup>®</sup> at their plant sites. However, through training of plant managers and upper management, employees became skilled in talking and listening to the community, and senior management provided the leadership to ensure the culture change occurred at the respective sites.

**Resources.** The Council has a strategic communications department for Responsible Care<sup>®</sup>. The department head, who is supported by one other administrative employee, is primarily responsible for management of the overall communication needs associated with Responsible Care<sup>®</sup>. These tasks include oversight of communication efforts with stakeholders, implementation of Responsible Care<sup>®</sup> communications strategies, and development of metrics and other management processes to measure quantitative and qualitative results of the communications program.

## **Program Manager for Chemical Demilitarization**

The Program Manager for Chemical Demilitarization (PMCD) is a national program with headquarters located on Aberdeen Proving Ground, Aberdeen, Maryland. The mission of PMCD is to destroy U.S. chemical warfare-related material while ensuring maximum protection to the public, personnel involved in the destruction effort, and the environment. PMCD supports meaningful public involvement by providing both information and outreach activities as well as opportunities for the interested public to participate in the decisionmaking process.

Guidance for Implementation. The PMCD community involvement program provides the guidance for implementing, initiating, conducting, and overseeing the outreach program for PMCD. The guidance provided by PMCD headquarters is general, requiring each site to develop site-specific plans and implement the information and involvement activities defined in those plans.

**Public Outreach and Information Office.** PMCD has established a Public Outreach and Information Office (POIO) to ensure a public involvement program that supports meaningful public participation and dialogue. The vision of the POIO states that, with management support, the POIO will gain public acceptance of the need for safe and expedious disposal of chemical warfare material. In addition, the POIO established site outreach teams at each stockpile site.

**POIO Strategy.** The POIO public outreach and involvement efforts are based on a three-tiered strategy developed to provide guidance to the community involvement program. The first tier of the strategy is the PMCD overarching public involvement strategy, which outlines the mission and vision for public outreach for the program as a whole and ensures consistency throughout the program. The second tier is comprised of mission area strategies, which incorporate the mission and vision of the national program, but provide a more tailored approach for the particular mission area to ensure that outreach and

involvement efforts meet the needs of the mission area stakeholders. The final tier consists of site implementation plans for each of the eight stockpile sites across the United States. The development of public involvement strategies and plans has been a collaborative effort by POIO, the site outreach teams, and PMCD.

**Performance Metrics**. PMCD measures accomplishments of objectives through a variety of surveys and processes. These include longitudinal, cross-sectional, and public opinion surveys, and site data collection, issues management, and evaluation processes. PMCD has also established a lessons-learned program for the regular exchange of information between each outreach site office and PMCD headquarters. PMCD also implemented a community outreach activity tracking system used by site and headquarters outreach teams to track public outreach and involvement activities as well as public comments and questions. This information helps the POIO and the site teams to monitor and evaluate their outreach and involvement efforts.

**Resources.** When PMCD began public activities in FY 1994, the budget for public affairs activities was \$600,000. There were three public affairs employees and there were no outreach offices. As of FY 1999, POIO had a total of 21 full-time staff members supporting the outreach office at each operating location and a budget of \$6.5 million.

# **Appendix D. Best Management Practices**

The evaluation team visited various DoD test and training ranges, as well as non-DoD and public sector organizations, where we observed model programs and best management practices employed in community involvement programs. This appendix summarizes community involvement best management practices. The following table identifies community involvement best management practices and their respective organizational entity.

Best Management Practices			
Community Best Management Practices	Responsible Organization		
Florida Defense Alliance	Eglin Air Force Base		
Encroachment Committee	Eglin Air Force Base		
Continuous Interaction With	Eglin Air Force Base		
Stakeholders			
Citizens Advisory Technical Team	Assembled Chemical Weapons		
	Assessment		
Overarching Strategy	Program Manager for Chemical		
	Demilitarization		
Handbook for Managers: Community	Brookhaven National Laboratory		
Involvement and Laboratory Decision			
Making			
Envoy Program	Brookhaven National Laboratory		
Chief Executive Officer Checklist	American Chemistry Council		
Public Participation Tool Box	The International Association for Public		
	Participation		
Installation Leader's Guide to	U.S. Army Environmental Center		
Environmental Public Involvement			
Sound Level Management Program	Aberdeen Test Center		

Florida Defense Alliance. Eglin AFB is a member of the Florida Defense Alliance, which is an organization that was created in 1998 to ensure that military bases and military host communities in the state of Florida are improving the efficiency of base operations. The mission of the Florida Defense Alliance is to promote base efficiency and to further military missions in Florida. The Florida Defense Alliance serves as an overall advisory body for Florida's defense related activities. It is comprised of designated representatives from each local base, local military base commanders, and state agency liaisons, as well as a number of individuals and groups with statewide perspectives and national experience. The mission, goals, and objectives of the Florida Defense Alliance point the way for the state of Florida to become a proactive participant in future defense realignment discussions and decisions.

Encroachment Committee. Eglin AFB has established an Encroachment Committee, which has documented objectives, decision processes, and performance indicators to measure success. The Encroachment Committee is comprised of members from all functional areas of the range, including range safety, long-range corporate plans, civil engineering, comptroller, environmental management, frequency management, test plans and operations, legal, and public affairs. The Encroachment Committee reviews all encroachment requests, and invites all those submitting requests to attend meetings to personally explain their concerns. During the review process, open dialogue is established, and decisions are made with mission impact being the first consideration. This dialogue has helped Eglin to establish a solid rapport with the community.

Continuous Interactions With Stakeholders. Eglin AFB holds discussions with stakeholders on a regular basis. The discussions are products of a proactive vision to take proactive measures before encroachment issues become a problem. Additionally, the range commander has demonstrated his commitment to community involvement by annually interfacing with civic leaders, general officers, and retired senior executives and presenting briefings, providing information on current activities conducted on the range, and receiving concerns. Civic leaders are invited to an annual meeting to interface with senior management. These sessions provide an opportunity for community leaders to give their insight on different encroachment issues and to discuss issues that they believe will make an impact on the community.

Eglin AFB has also formed partnerships with the local mayors and the Florida Governor. These partnerships have matured to the point where Eglin AFB has become a member of key planning organizations within the state of Florida. A quarterly Mayors' Breakfast is conducted with mayors of local communities and upper management of Eglin AFB, including the range commander. Range commanders also meet biannually with the Florida Governor to ensure that any issues that need to be addressed at that level are discussed. This enables commanders to personally communicate concerns of a nature where the state might provide assistance. This personal interface has opened up the lines of communication with the Governor, the Governor's staff, and state agencies.

Citizens Advisory Technical Team. Congress established the Assembled Chemical Weapons Assessment (ACWA) program in 1997 in accordance with Public Law 104-208. The mission of ACWA is to demonstrate not less than two alternative technologies to the baseline incineration process for the demilitarization of assembled chemical weapons. ACWA created the Citizens Advisory Technical Team, which was comprised of four dialogue participants that represent a diversity of perspectives and a technical consulting firm. Team members signed confidentiality papers, allowing them to attend DoD procurement meetings. By participating in meetings normally open only to DoD personnel, the Citizens Advisory Technical Team provided dialogue members with assurances that the criteria are being used appropriately to select and evaluate technologies. According to the 1999 ACWA application for the Innovations in Government Award, never before have citizens been so fully involved in a DoD procurement process.

Overarching Strategy. The foundation of the community involvement program for PMCD is an overarching public involvement strategy that states the mission, vision, senior management commitment, and roles and responsibilities for the POIO within PMCD. This overarching strategy provides management with the necessary oversight, guidance, training, expertise, and tools to support public information and involvement activities at each site and respective local community.

The PMCD overarching strategy includes three tiers of guidance. The first tier represents the overarching strategy for PMCD, which outlines the mission and vision for public outreach. The second tier is formed of the mission area strategies, which incorporate the mission and vision of the national program, but provide a more tailored approach for the particular mission area to ensure that the mission area and involvement efforts meet specific needs of the stakeholders. The third tier consists of site implementation plans for each operating location.

The overarching strategy also contains performance metrics and program evaluation. Surveys, site data collection, issues management, and lessons learned are all methods employed to measure accomplishments. Information is routinely exchanged between each site outreach office and headquarters, which helps the sites and headquarters office to track public outreach and involvement activities, as well as public comments and questions. This information helps POIO and the site teams to monitor and evaluate their outreach and involvement efforts.

Handbook for Managers. BNL developed a handbook for managers for conducting community involvement activities. The handbook provides specific instructions on how to implement the community involvement process that is described in the BNL Community Involvement Plan. The handbook includes a step-by-step checklist for identifying issues that may require community involvement. Managers are required to complete the checklist for all issues and decisions that have any potential for interest or concern in the community.

Issues that may require community involvement can also be brought to BNL via several community sources, such as the Community Advisory Council, local community groups, and community members. These groups or individuals can bring issues of interest to the attention of BNL through direct contacts with BNL managers and staff; through the Community, Education, Government, and Public Affairs Office; or through government representatives and agencies.

**Envoy Program.** The Envoy Program is a volunteer program established by the BNL Community, Education, Government, and Public Affairs Office. BNL personnel volunteer to be an envoy or spokesperson for BNL at organizations that they belong to within the community, such as civic, educational, or recreational organizations. Community Relations personnel train the envoys on how to listen and communicate with the public, and meet with the envoys monthly to provide presentations on BNL programs and current issues. These meetings provide an avenue for BNL envoys to provide feedback from the civic organizations regarding issues that concern the community members.

Chief Executive Officer Checklist. The Responsible Care® Program contains the American Chemistry Council policy, guidance, mission, vision, and reasons for implementation, oversight, coordination, roles, and responsibilities. The Responsible Care® Program instituted a checklist for Chief Executive Officers of member companies. This checklist helps to ensure that member companies are instituting the Responsible Care® Program as outlined in the guiding principles.

Public Participation Toolbox. The International Association for Public Participation is an association that seeks to promote and improve the practice of public participation in relationships among individuals, governments, institutions, and other entities that affect the public interest in nations throughout the world. The International Association for Public Participation developed a toolbox of information and techniques to assist in the public participation process. It includes different techniques to use when involving the public. The toolbox is separated into different types of stakeholders and situations that may be encountered by organizations relative to the goal for involving communities. Types of community involvement range from passive public information techniques to solving problems with large groups. The toolbox suggests techniques for successful community involvement for different scenarios.

Installation Leader's Guide to Environmental Public Involvement. The Army Environmental Center at Aberdeen Proving Ground is drafting the Installation Leader's Guide to Environmental Public Involvement to help Army range commanders and their staff meet community involvement challenges by providing a framework for a community involvement plan. This guide sets forth a systematic approach that incorporates an assessment of the public's needs and perceptions at critical points in the development and execution of the community involvement plan. The community involvement plan includes a detailed set of goals and objectives, specific strategies, a variety of tactics or tools, and evaluation process. The leader's guide outlines methods for conducting community involvement for a range of environmental issues. The leader's guide provides a step-by-step process to establish, execute, and maintain a community involvement program at any DoD installation.

Sound Level Management Program. The Aberdeen Test Center on Aberdeen Proving Ground developed a Sound Level Management Program as a result of noise complaints from the surrounding communities. The mission of this program is to support test and training programs, manage generated sound levels at receptor locations, and reduce noise complaints with minimal impact to the community and the mission. The program's objective is to responsibly manage the noise program and minimize the annoyance of the blast noise and vibration levels impacting the surrounding communities. The Sound Level Management Program provides community involvement efforts, including calls and visits, quarterly reports, public meetings, and a noise and shock symposium. Additional efforts include:

- utilizing a call database to inform key citizens of scheduled testing;
- administrative protocols, including coordination with legal counsel, public affairs office, tenants, and the public, to inform them of scheduled testing and to gain feedback on the Sound Level Management Program;

- publication of a newspaper for stakeholders to keep them up to date on news and issues at Aberdeen Test Center, located within Aberdeen Proving Ground;
- routine public meetings to promote awareness and information exchange; and
- a toll-free number for noise concerns staffed 24 hours every day.

The Sound Level Management Program also incorporates the use of a daily calibration shot that is monitored at the perimeter of the range and at certain locations within the community. Information from the sound monitors is entered into a Noise Assessment Prediction System, which aids in the prediction of how far and where noise from a testing activity will carry. These predictions aid in the focus of community involvement and outreach efforts for areas where noise in the community from testing may be an issue.

# **Appendix E. Report Distribution**

## Office of the Secretary of Defense

Under Secretary of Defense for Acquisition, Technology, and Logistics Deputy Under Secretary of Defense (Installations and Environment) Under Secretary of Defense (Comptroller)/Chief Financial Officer Deputy Chief Financial Officer Deputy Comptroller (Program/Budget) Under Secretary of Defense for Personnel and Readiness Director, Operational Test and Evaluation

## **Department of the Army**

Assistant Secretary of the Army (Installations and Environment) Auditor General, Department of the Army

## **Department of the Navy**

Assistant Secretary of the Navy (Installations and Environment) Naval Inspector General Auditor General, Department of the Navy

## **Department of the Air Force**

Assistant Secretary of the Air Force (Financial Management and Comptroller) Assistant Secretary of the Air Force (Installations, Environment, and Logistics) Auditor General, Department of the Air Force

## **Non-Defense Federal Organization**

Office of Management and Budget

# Congressional Committees and Subcommittees, Chairman and Ranking Minority Member

Senate Committee on Appropriations

Senate Subcommittee on Defense, Committee on Appropriations

Senate Committee on Armed Services

Senate Committee on Governmental Affairs

House Committee on Appropriations

House Subcommittee on Defense, Committee on Appropriations

House Committee on Armed Services House Committee on Government Reform

House Subcommittee on Government Efficiency, Financial Management, and

Intergovernmental Relations, Committee on Government Reform

House Subcommittee on National Security, Veterans Affairs, and International Relations, Committee on Government Reform

House Subcommittee on Technology and Procurement Policy, Committee on Government Reform

Deputy Under Secretary of Defense (Readiness), Deputy Under Secretary of Defense (Installations and Environment), and the Director of Operational Test and Evaluation Comments



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

PERSONNEL AND

June 14, 2002

MEMORANDUM FOR (DIRECTOR, CONTRACT MANAGEMENT DIRECTORATE)
OFFICE OF THE INSPECTOR GENERAL

SUBJECT: Inspector General Draft Report on DoD Environmental Community Involvement Programs at Test and Training Ranges (Project No. D2001CB-0186.000)

This memorandum forwards the combined response of the Deputy Under Secretary of Defense (Readiness), the Deputy Under Secretary of Defense (Installations and Environment), and the Director, Operational Test and Evaluation to the Inspector General's Draft Report on DoD Environmental Community Involvement Programs at Test and Training Ranges (Project No. D2001CB-0186.000).

We appreciate the opportunity to comment on this draft report. Community involvement is an important aspect of the range sustainment effort within DoD, and the Inspector General's report provides valuable insights in this regard. We agree with the general finding that the Department must establish a more comprehensive community outreach and involvement approach. While effective community involvement is at its core a local endeavor, we intend to work to improve and coordinate our efforts at the local, regional and national levels.

In most instances, we concur with the findings offered within and believe they will help in DoD's range sustainment efforts. Specific comments to the draft report are attached. The Services have reviewed the draft report as well; their opinions were generally favorable. However, the Navy observed that the report does not adequately reflect the many positive community programs in place at their facilities and ranges, and focuses too narrowly on community relations as a subset of environmental functions instead of overall range management. These observations should be considered as you finalize your report.

Paul W. Mayberry

Part W. Maffeny

Deputy Under Secretary of Defense

(Readiness)

Attachments: As stated



#### TAB A

#### **COORDINATION SHEET**

Subject: Review and Comment on Inspector General Draft Report on DoD Environmental Community Involvement Programs at Test and Training Ranges (Project No. D2001CB-0186.000)

The Office of each signatory below has reviewed and commented on the subject report. These comments have been consolidated and provided in a single package.

PM	14 June 02	Paul W. Mayberry
		Deputy Under Secretary of Defense (Readiness)
		Raymond F. DuBois, Jr. Deputy Under Secretary of Defense (Installations and Environment)
		Thomas Christie Director, Operational Test and Evaluation

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Deputy Under Secretary of Defense
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Deputy Under Secretary of Defense (Installations and Environment)

Thomas Christie
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Deputy Under Secretary of Defense
(Readiness)

Raymond F. DuBois Deputy Under Secretary of Defense (Installations and Environment)

Thomas P. Christie
Director, Operational Test and Evaluation

1 4 JUN 2002

#### TAB B

REVIEW COMMENTS FOR DRAFT OF A PROPOSED EVALUATION REPORT ON DOD ENVIRONMENTAL COMMUNITY INVOLVEMENT PROGRAMS AT TEST AND TRAINING RANGES Office of the Inspector General, Department of Defense

#### **General Comments**

 Executive Summary, Summary of Recommendations, Sentence starting with "We recommend that..."

Recommendation: Revise to say "...the Sustainable Ranges Overarching Integrated Product Team (OIPT) should conduct a study and provide a recommendation to the Deputy Secretary of Defense concerning establishment of the community involvement function."

Rationale: Although the recommendation for this function is supported by the draft report, OSD and the Services should address the matter through the OIPT to determine an appropriate means of implementation.

2. Page 2, Background Section, Senior Readiness Oversight Council subsection, last paragraph starting with "The Defense Test and Training Steering Group formed...."

Comment: The DTTSG formed a Sustainable Ranges Working Group (SRWG). The DTTSG did not form joint working groups with the exception of the Outreach Subgroup under the SRWG. Initially, the Terms of Reference for the SRWG encouraged the group to engage with and take advantage of existing boards and committees.

Recommendation: Revise paragraph to read: "The Defense Test and Training Steering Group formed the Joint OSD and Services Sustainable Ranges Working Group (SRWG) to address each issue. The SRWG worked with existing DoD boards and committees populated by subject matter experts in the other eight issues. The Outreach subgroup developed a...."

Rationale: The above rewrite better reflects the background with respect to the roles of the SROC, DTTSG and the SRWG.

3. Page 2, Background Section, Congressional Concerns subsection, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence on page 3 starting with "The integrated product team..."

Comment: The IPT has been structured into two groups. The senior IPT is comprised of executive flag-level Officers and SES members. This IPT has Overarching IPT (OIPT) responsibility to respond to the Secretary of Defense direction contained in his memorandum of December 4, 2001. Supporting the OIPT is the Working IPT

Revised

#### Final Report Reference

(WIPT) whose membership includes mid-level OSD and Service managers. While it is basically correct to state that both the OIPT and WIPT meet monthly, it should be noted that the WIPT meets more frequently, as necessary, to provide products to the OIPT for consideration. Additionally, a new coordination group called the Readiness and Ranges Preservation Initiative (RRPI) Tiger Team has been formed. This group is made up of both the OIPT and WIPT members." The Tiger Team meets frequently concerning activities related to the RRPI (e.g., congressional hearings, workshops, and national-level outreach).

Recommendation: Revise sentence to read, "The Integrated Product Team was established in December 2001. Two levels of IPT membership have been structured to respond to the December 4, 2001, Deputy Secretary of Defense direction. The Overarching IPT (OIPT), comprised of flag-level Officers and SES members, reports to the Deputy Secretary. Supporting the OIPT is the Working IPT (WIPT) whose membership includes mid-level OSD and Service members. The OIPT and WIPT meet on as as-required basis, approximately monthly. Additionally, a rapid response team including a number of OIPT and WIPT members been formed to coordinate short-fused daily activities associated with the Readiness and Ranges Preservation Initiative (RRPI). The RRPI Tiger Team meets as often as daily depending on activity related to RRPI (e.g., congressional hearings, workshops, and national-level outreach).

Rationale: Accuracy.

#### **Findings**

Cultural Shift, page 4: Concur

Elements for Community Involvement Programs, page 4:

- Stakeholder Involvement, page 5: Concur
- Senior Management Commitment, page 5: Concur
- Single Point of Contact, page 5: Concur, given the following revisions.

Recommendation: The first sentence should be revised to read: "Ranges and installations should clarify functional responsibilities for disseminating information on range issues to the local community, internal audiences, and media outlets on environmental, training, testing and natural resource matters, issues, concerns and successes, to include consideration of establishing a single point of contact. Such a function should support all the facets of a range's community involvement program and should act as the range spokesperson on all environmental, testing, and training issues. In addition, when appropriate, this point of contact should communicate and coordinate with the Installation community involvement/public affairs office."

Rationale: The situation at each installation or range is so unique that a single organizational solution may not be appropriate in many cases. Also, the original draft paragraph as written is focused on environmental matters only. Issues of training

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times, locations, weapons systems being used, air space, frequency spectrum use, as well as natural resources concerns are also subjects of community inquiries. This paragraph also assumes that the range is treated separately from the installation. In many cases, issues are also critical to the installation as a whole and the paragraph should include coordination with the installation community involvement program/public affairs point of contact.

- Site-Specific Implementation Plans, page 5. Concur
- Resources, page 5. Concur
- Accountability, page 5. Concur, however, the addition of "and where appropriate
  the installation commander" should be added to the end of the last sentence.
- Training, page 5. Concur
- Performance Metrics, page 5. Concur

#### Test and Training Range Efforts, page 6

- Lack of Necessary Elements, page 6. Concur
- Disjointed Efforts, page 6. Concur.
- Best Practices, page 7. Concur

#### Policy and Guidance, page 7

- Existing Policy, page 7. Concur.
- Environmental Laws Requiring Community Involvement, page 7. Concur.
- Draft Directive, page 7. Concur, given the following revision:

Comment: Information needs to be updated. The Outreach group was not formed by the SROC, but by the DTTSG's working body, the Sustainable Range Working Group, in order to address outreach-related issues and actions.

Recommendation: The Outreach subgroup to the SRWG, formed by the DTTSG, has been developing...."

Rationale: Correctly reflects the creation of the Outreach subgroup.

 Draft Sustainable Ranges Outreach Plan, page 8. Concur, given the following revision:

Recommendation: Delete the first sentence and replace with the following, "The OIPT has assigned the Range Sustainment WIPT the task of developing and implementing a National Stakeholder Involvement/Community Outreach plan. DoD has contracted with SRS Technologies to support this effort."

Rationale: Better reflects the actual nature and circumstances of SRS involvement.

- Analysis of Draft Policy and Guidance, page 8. Concur
- OSD-Level Functional Proponent, page 9. Concur
- Mission Risks, page 9. Concur.

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- Deleted

- Environmental Civil Liability, page 10. Concur
- Negative Impacts on Operations, page 10. Concur
- Strained Community Relations, page 11. Concur
- At-Risk Methodology, page 11. Concur, with the following revision

Recommendation: Delete the second sentence, and replace with the following: "We believe that DoD needs to identify ranges at risk in order to more effectively address encroachment impacts on their mission."

Rationale: Prioritization of ranges based solely on levels of encroachment would be counterproductive. Ranges should be assessed based on their importance to the test or training mission. Then, vulnerability to encroachment can be evaluated in order to develop strategies to best preserve their ability to sustain test and training.

#### Recommendations, page 12-13

- 1. Publication of comprehensive guidance and policy..., page 12. Concur
  - a. Incorporation of stakeholder input, page 12. Concur
  - b. Designation of single point of contact, page 12. Concur, consistent with prior comment on single point of contact focusing on more than just environmental matters, page 5.
  - c. Implementation of site-specific plans, page 12. Concur
  - d. Planning, programming and budgeting at all levels. Concur
  - e. Development of training programs, page 12. Concur
  - f Establishment of performance metrics, page 12. Concur
- 2. The concept of community involvement and definition of terms, page 12.
  - a. "Community involvement," page 12. Concur
  - b. "Encroachment," page 12. Concur
- 3. Establishment of community involvement function within DUSD(R). Concur with comment. This recommendation is too specific and premature at this point. We believe the Sustainable Ranges Overarching Integrated Product Team (OIPT) should evaluate this issue and provide a recommendation regarding the full responsibilities and location of a community involvement function in the office of the Deputy Secretary of Defense.
  - a. Coordinate community involvement programs, page 13. Defer concurrence pending OIPT definition of community involvement responsibilities
  - b. Coordinate with Services and other Federal ..., page 13. Defer concurrence pending OIPT definition of community involvement responsibilities
  - c. Provide expert advice and training across DoD, page 13. Defer concurrence pending OIPT definition of community involvement responsibilities
  - d. Establish a database, page 13. Defer concurrence pending OIPT definition of community involvement full responsibilities

# **Team Members**

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