



Office of Inspections
Office of Inspector General
U.S. General Services Administration

**Public Buildings Service Is Not Providing Oversight Of
Maintenance For Indoor Firing Ranges In GSA-Owned
Buildings**

JE26-001

December 9, 2025

Introduction

In November 2024, the General Services Administration (GSA) Office of Inspector General (OIG), Office of Inspections, initiated an inspection of indoor firing ranges (ranges) located within GSA-owned buildings. The objective of this inspection was to determine if the Public Buildings Service (PBS) is complying with agency policies and federal regulations for the maintenance and safety of ranges located within GSA-owned buildings.

PBS supports approximately 30 ranges within GSA-owned buildings across the 11 GSA regions.¹ These ranges are training facilities designed specifically for small arms ammunition weapons qualifications using both live-fire ammunition and non-lethal ammunition (i.e., tasers or rubber bullets).² Ranges within GSA-owned buildings are exclusively used by law enforcement agencies for the purpose of training, firearms qualifications, proficiency testing, and certification.

This report contains our finding from conducting interviews, reviewing documentation, and making observations during site visits to the following judgmental sample of buildings (see Appendix A for site selection process):

1. Edward A. Garmatz U.S. District Courthouse, Baltimore, Maryland (Garmatz Courthouse)
2. U.S. Bankruptcy Courthouse, Tallahassee, Florida (Bankruptcy Courthouse)
3. Sandra Day O'Connor U.S. Courthouse, Phoenix, Arizona (O'Connor Courthouse)
4. Oroville Land Port of Entry, Oroville, Washington (Oroville LPOE)
5. William Jefferson Clinton Federal Building, Washington, D.C. (Clinton Building)

Our inspection found that PBS did not provide effective oversight of the operations and maintenance of these ranges. We found that the range at the Oroville LPOE is operating in an unsafe manner. We discovered that the range's target retrieval system was broken, which is a violation of the *GSA PBS Indoor Firing Range Design and Operations Criteria* (Range Criteria). The broken target retrieval system affects the range's safety and operational efficiency, and PBS has so far failed to address the unsafe conditions.

During our site visits, we identified instances of noncompliance with the Range Criteria at all five ranges, such as a lack of documentation that inspections and cleanings were performed by qualified personnel experienced in range design and operations. We also observed inconsistencies with the interpretation of the range program requirements and confusion as to who has the ultimate responsibility to carry out the required biennial range inspections. This confusion specifically caused building operations personnel at the Clinton Building to claim that GSA delegated the range operations and maintenance to the tenant agency; however, Clinton Building personnel were unable to provide any documentary evidence to support that claim.

¹ On October 20, 2025, PBS reorganized from a regional organizational structure to a national organization structure.

² GSA Order PBS 1000.4B, *High Risk Operations*, at Section 5d: Firing Range.

Our report makes two recommendations to address the issues identified during the inspection. In response to our report, GSA management agreed with our recommendations. Management comments can be found in their entirety in Appendix B.

Background

PBS, as the landlord for the civilian federal government, oversees the design, construction, and maintenance of federally owned buildings and courthouses, ensuring the efficient and cost-effective use of government-owned and leased properties. Inside some of PBS's federally owned buildings and courthouses are high-risk operations such as ranges, which are used exclusively by law enforcement agencies. Although PBS does not directly operate or use the ranges, it is responsible for facilitating cyclical maintenance and repairs to prevent environmental, health, and safety risks to the buildings and the people around them.³

Within the PBS Office of Facilities Management, the Facility Risk Management Division is responsible for: (1) inspecting range safety and operations relative to regulatory requirements, GSA standards, and industry practices; (2) reviewing ventilation system performance; (3) collecting occupational exposure and air flow data; and (4) ensuring documentation of proper cleaning and maintenance procedures. *Figure 1* below shows a range inside the Bankruptcy Courthouse.

Figure 1. Bankruptcy Courthouse Indoor Firing Range⁴



According to an environmental program expert in the PBS Office of Facilities Management, PBS provides the lease and awards maintenance and repair contracts on the tenant's behalf. However,

³ PBS Commissioner Memorandum to PBS Regional Commissioners, *Indoor Firing Range Cyclical Maintenance and Repairs*, dated July 31, 2019, at Section 5

⁴ Picture taken by the inspection team on May 6, 2025.

the tenant agency is responsible for funding the operations and maintenance, correcting deficiencies, and the closing and dismantling of ranges.

GSA Responsibility in Range Operations and Maintenance

In 2001, the Office of Management and Budget (OMB), with agreement from the U.S. Department of Justice, issued instructions that no new firing ranges should be constructed and no renovations should be done on existing ranges in federal buildings unless the tenant agency obtains an exemption from OMB.⁵ While this creates limitations on constructing and renovating ranges under GSA jurisdiction, custody, or control, the existing ranges still receive necessary cyclical maintenance and repairs so the ranges do not present environmental, health, or safety risks to the buildings and people around them.

Through its *Policy on Indoor Firing Ranges* memorandum (Range Memo), dated April 2012, GSA implemented a national standard for the design and operation of the ranges. The Range Memo established that all ranges “shall be designed, operated, and maintained in accordance with the *GSA PBS Indoor Firing Range Design and Operations Criteria*, (Range Criteria), dated April 2012”⁶ The Range Criteria also incorporates documentation requirements for critical range functions, such as comprehensive cleaning and inspections.

In addition to the Range Criteria, the *Indoor Firing Range Cyclical Maintenance and Repairs* memorandum (Maintenance Memo), dated July 31, 2019, provides clarifying instructions regarding maintenance and repairs for ranges in properties under the jurisdiction, custody, or control of GSA, including properties delegated by GSA.⁷ The Maintenance Memo clarifies GSA’s role in providing range maintenance and repairs.

Specifically, GSA accepts reimbursable work authorizations from the tenant agency to fund the cyclical maintenance and repairs of the ranges to maintain proper functionality and safe operations of ranges without exemptions from OMB.⁸ This process begins by GSA receiving the reimbursable work authorizations from the tenants for range cleanings or inspections, then GSA procures these services on behalf of the tenant agency. The final step involves the respective GSA building manager coordinating with a qualified contractor to deliver the services to the tenants.

This report discusses PBS’s lack of oversight of the operations and maintenance of ranges within federally-owned buildings. We found that the Oroville LPOE range is still operating despite a serious maintenance issue that compromises the safety of those using the range. We also found that PBS did not ensure that comprehensive inspections or cleanings occurred or that they were properly documented according to GSA’s criteria.

⁵ *Indoor Firing Range Cyclical Maintenance and Repairs*, at Section 2.a.

⁶ Range Memo, at Section 4: Policy.

⁷ A delegation would have documentation such as a Delegation of Authority.

⁸ Constructing, renovating, or repairing a range to comply with the Range Criteria or to bring an out-of-service range into service does require an OMB exemption.

Finding

PBS Did Not Provide Oversight of Indoor Firing Ranges in GSA-Owned Buildings

We inspected the primary range components established in the Range Criteria: (1) range safety procedures, (2) design, and (3) operations and maintenance protocols, at five ranges in GSA-owned buildings. We found that PBS did not fully comply with the Range Criteria at any of the five ranges and did not have complete documentation that inspections were performed by qualified personnel experienced in range design and operations. The inspection team evaluated range design features such as the material of range walls; protection of range ceilings; collection of rounds at bullet traps; and the heating, ventilation, and air conditioning units.⁹ Although we did not find any issues related to the range designs, the issues related to the remaining range components raise concerns about the health and safety of personnel at the individual facilities.

Violations of Range Standards Identified During In-Person Inspections

During our site visit to the Oroville LPOE, we found a broken target retrieval system, which is a serious maintenance issue that affects the range's safety and operational efficiency. See *Figure 2* on the next page for a picture of the broken target retrieval system. The tenant agency told us that the target retrieval system has been inoperable since 2017. The tenant agency could not use the target retrieval system to move targets to a desired distance from shooters. The target retrieval system is a critical feature that allows shooters to remotely control the targets' distance from the firing line, eliminating the need for personnel to go beyond the firing line during normal operations. The target retrieval system creates a controlled environment to prevent range users from injuring one another due to gunfire.

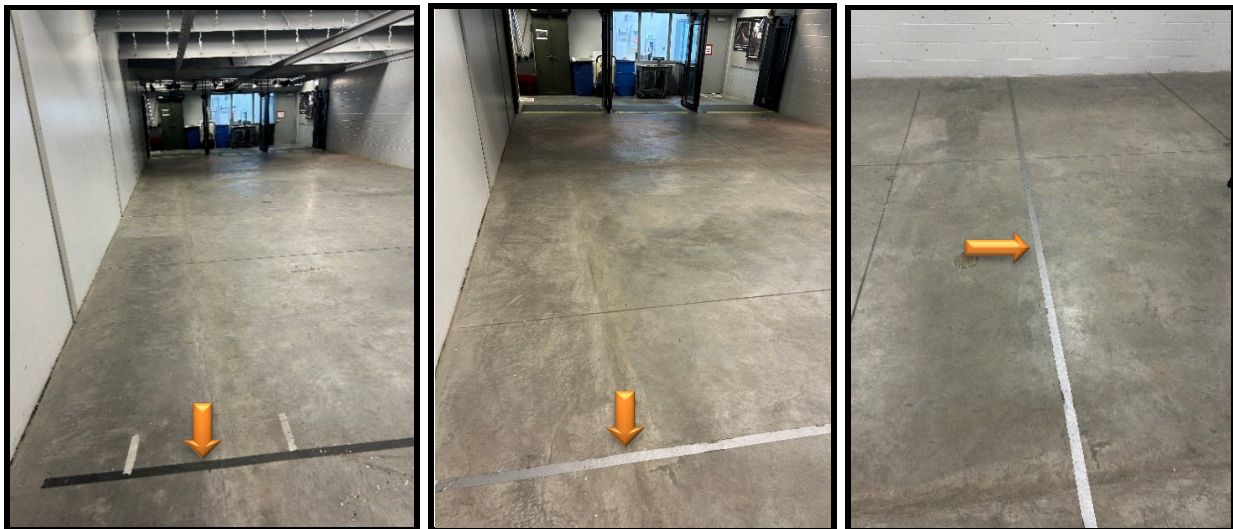
⁹ Ranges are required to have separate ventilation systems from the rest of the building to prevent airborne lead and carbon monoxide exposure.

Figure 2. Broken Target Retrieval System Equipment at the Oroville LPOE ¹⁰



Due to this continuing issue, the tenant agency firing range instructor explained that they conduct firearms training by positioning the targets at a fixed position at the back of the range, and place visible duct tape on the floor in front of the firing line at various distances so personnel can move closer or farther away from the targets to adjust their desired distance. *Figures 3–5* below show the firing lines that Oroville LPOE tenant agency personnel added to indicate different distances from the target.

Figures 3–5. Duct Tape Firing Lines at the Oroville LPOE ¹¹



¹⁰ Photograph taken by inspection team, April 29, 2025.

¹¹ Photographs taken by inspection team, April 29, 2025.

Operating the range in this manner does not adhere to the Range Criteria and puts the safety of those who use the range at risk. According to the Range Criteria, no access should be allowed in front of the firing line except for cleaning or maintenance.¹² Moreover, the Range Criteria requirements were developed to ensure ranges utilize fixed firing lines, which do not permit shooters to train beyond the firing line.¹³

The Maintenance Memo states that GSA will accept funds and process requests from tenant agencies without any OMB exemptions to perform range maintenance and repairs for the purpose of maintaining proper functionality and safe operations.¹⁴ However, the Oroville LPOE tenant agency expressed frustration with the process. Tenant agency personnel said they have made several requests over the course of a decade to repair the broken target retrieval system, but GSA has not been responsive to their requests.

The PBS building manager at the Oroville LPOE and their supervisor stated they were not aware of the issue until our April 2025 site visit. They were assigned to their positions in March 2025, due to personnel turnover at this location. Additionally, the building manager could not locate documentation relating to this matter due to the loss of building operations personnel.

The continued operation of the Oroville LPOE range without a working target retrieval system increases the risk of injury from gunfire and increased exposure to lead and other toxins. The tenant agency added that the target functionality issue is also interrupting its ability to complete training and has caused operational delays.

Missing Comprehensive Inspection Documentation

According to the Range Criteria, periodic and regular inspections and evaluations of operating ranges are required to promote compliance with safety and health requirements.¹⁵ Specifically, at a minimum, ranges are required to undergo comprehensive inspections, testing, and evaluations every 2 years.¹⁶ In addition, each comprehensive inspection report must document and retain the range's adherence to the appropriate air flows, ventilation performance, noise levels, lighting intensities, airborne lead levels, and cleaning and maintenance procedures. However, there is no standard practice for where, how, or for how long the building operations personnel should store records related to their respective ranges.

We found that since November 2021, only one of the five ranges we visited, the O'Connor Courthouse, retained evidence of a comprehensive inspection in their files as required. O'Connor

¹² Range Criteria, at Section 3.0: Operations and Maintenance Criteria.

¹³ *Id.*, at Section 2.0: Design Criteria.

¹⁴ Maintenance Memo, at Section 5.a.2.

¹⁵ Range Criteria, at Section 1.2: Safety and Compliance.

¹⁶ *Id.*, at Section 3.5: Inspection and Testing.

Courthouse building operations personnel only were able to provide evidence of a comprehensive inspection that took place in February 2023.¹⁷

The Oroville LPOE building operations personnel were only able to provide one partial inspection record that measured the airflow in 2022, but it did not include the remaining required information. The Bankruptcy Courthouse building operations personnel were able to provide us with evidence of post-comprehensive cleaning inspections, which primarily focused on the lead levels on surfaces, but did not include all the required information for a comprehensive inspection. The remaining two ranges, at the Garmatz Courthouse and the Clinton Building, were unable to provide any inspection records that measured the required range performance metrics.

During our inspection, we found inconsistencies with the interpretation of range program requirements and confusion as to who has the ultimate responsibility to carry out the biennial range inspections. A PBS program official overseeing the range program stated that the building managers and operations and maintenance vendors determine the frequency that the inspections are completed, which does not adhere to the Range Criteria requirement. Another PBS program official overseeing the range program revealed that although inspections are required, based on their experience with the program, they are not being performed.

The supervisor of the Garmatz Courthouse building manager stated that they “believed” there was an inspection of the range in their building before their tenure began, but they could not locate any details or documentation. The Clinton Building’s building manager explained that GSA does not perform inspections of the range, nor do they have an existing requirement to do so. However, as stated earlier, the Range Criteria requires GSA to ensure that ranges undergo comprehensive inspections every 2 years. The Clinton Building’s building manager also said that they could not find any previous records of an inspection in GSA’s National Computerized Maintenance Management System.¹⁸

With the respective range personnel being unable to provide the required documentary evidence of the biennial comprehensive inspection results, or that the biennial comprehensive inspections are taking place at all, PBS is unable to ensure that the ranges are operating in accordance with the GSA Range criteria.

¹⁷ Comprehensive inspections are designed to ensure safety, policy and regulatory compliance, functionality, and environmental integrity. If any instances of minor noncompliance are present, the Range Criteria advises the range safety officer, the tenant agency, or building manager to address the issue. However, significant instances of noncompliance should be managed through GSA’s regional environmental and industrial hygiene personnel and may result in the range shutting down until corrective measures have been taken.

¹⁸ GSA describes National Computerized Maintenance Management System as a system that maintains information about each building’s maintenance operations to help GSA maintain the facilities effectively, and to plan and track building equipment inventories, maintenance schedules, work orders, and service requests.

Missing Comprehensive Cleaning Documentation

The Range Criteria specifies that “a site-specific cleaning plan shall be documented for each facility ... the cleaning procedures and plan shall incorporate ... comprehensive cleaning at a minimum of once a year and shall include cleaning of all surfaces both within the range and in the support facilities. Wipe tests shall be conducted to verify the effectiveness of this comprehensive cleaning.”¹⁹ As of May 20, 2025, none of the five ranges we inspected were able to produce a site-specific cleaning plan or documentary evidence of annual comprehensive cleanings taking place every year between 2022–2024. Also, only three of the five ranges we inspected were able to provide any documentation confirming that an annual cleaning took place at some time in the same period.

The acting building manager at the Bankruptcy Courthouse explained they routinely had difficulty getting funding for their annual comprehensive cleaning. Further exacerbating the issue were the unpredictable timelines within the funding approval process, which delayed the cleanings outside of the yearly time frame. The acting building manager also said they had difficulty locating range documents because recent RIFs at GSA affected personnel at several offices where range documentation would be located.

Additionally, building operations personnel at the Clinton Building were unable to provide any documentation for the annual range comprehensive cleanings, claiming the range at the building was delegated to the tenant agency. However, they were also unable to produce any documentary evidence to support this claim.²⁰

Comprehensive cleanings and wipe tests mitigate exposure to lead, gases, and other toxins related to firearm discharge for shooters, range officers, and other building occupants. The lack of specific record-keeping requirements causes continuity issues during periods of turnover and prevents PBS from ensuring that proper range oversight is not interrupted during personnel changes.

Unsafe range operations and PBS’s inability to produce inspection and cleaning records show that PBS does not provide sufficient oversight of ranges in GSA-owned buildings. Without comprehensive inspections and cleanings, tenant agencies are at greater risk of unsafe operations, unhealthy working environments, and reduced operational capacity and efficiency. If PBS does not periodically evaluate and retain performance information on its ranges, it cannot make informed decisions regarding updates to the health and safety requirements in its Range Criteria.²¹

¹⁹ Range Criteria, at Section 3.1: Facilities Cleaning.

²⁰ Delegation Authority is the formal process that allows GSA to grant another individual or agency the right to make decisions, take actions, or perform duties on their behalf, within defined limits.

²¹ Range Criteria, at Section 1.2: Safety and Compliance.

Conclusion

PBS is not providing oversight of the ranges in GSA-owned buildings and is not ensuring adherence to the published GSA Range Criteria and Range Memo. We found numerous instances of noncompliance with GSA's Range Criteria. While not all noncompliance is considered a safety risk, the broken target retrieval system found at the Oroville LPOE range placed the tenant agency and personnel at a greater risk of an unsafe working environment, and caused a reduction in operational capacity and efficiency.

We also found during our inspection that PBS did not ensure that the range inspections and cleanings were performed and documented as required by the GSA Range Criteria. PBS could not produce inspection records and comprehensive cleaning documentation, despite a requirement to keep these records on file. Effective record keeping is essential for safe and compliant range operations. The records not only facilitate operational planning and risk management, but also serve as critical evidence for regulatory compliance. In addition, proper documentation of range operations supports informed decision making on safety improvements and policy updates. Without evidence of inspections being performed, GSA, tenant agencies, and range users do not have assurance that the ranges are being maintained to ensure a safe environment for their continued use.

Recommendations

We recommend that the Commissioner of the Public Buildings Service:

1. Coordinate with the tenant agency at the Oroville LPOE range to assess the target retrieval system operation and determine a corrective action plan to address any issues identified.
2. Develop and issue a comprehensive policy that, at a minimum, establishes roles and responsibilities for the operation and maintenance of the indoor firing ranges; document retention requirements; and comprehensive inspection and cleaning procedures.

Appendix A: Objective, Scope, and Methodology

On November 12, 2024, the GSA OIG, Office of Inspections initiated an inspection of indoor firing ranges located within GSA-owned buildings. Our objective was to determine if GSA is complying with agency policies and federal regulations for the maintenance and safety of ranges located within GSA-owned buildings. To accomplish our objective, we:

- Researched laws, regulations, policies, criteria, and other federal guidance on indoor firing ranges in federal buildings;
- Reviewed relevant audits and inspections conducted by GSA OIG and other federal agencies;
- Interviewed PBS personnel responsible for overseeing indoor firing range operations at the following locations:
 1. Edward A. Garmatz U.S. District Courthouse, Baltimore, Maryland
 2. U.S. Bankruptcy Courthouse, Tallahassee, Florida
 3. Sandra Day O'Connor U.S. Courthouse, Phoenix, Arizona
 4. Oroville LPOE, Oroville, Washington
 5. William Jefferson Clinton Federal Building, Washington, D.C.
- Interviewed GSA tenant agency personnel managing indoor firing range operations;
- Conducted site visits to assess range compliance with (1) safety, (2) design, and (3) cleaning and maintenance procedures; and
- Analyzed reimbursable work authorizations, inspection checklists, scopes of work for range cleaning documentation, and observations made during site visits.

The team initially intended to examine the GSA National Capital Region, with plans to review and issue separate reports. However, due to the limited number of non-delegated indoor firing ranges in GSA-owned buildings, the inspection team selected a judgmental sample of non-delegated ranges across several GSA regions impacted by RIFs that covered a wide sample of geographic locations. Our final scope included a judgmental sample of ranges across five GSA regions. The inspection team requested documentation for the period of November 1, 2021, through May 28, 2025.

This inspection was conducted in accordance with the Council of the Inspectors General on Integrity and Efficiency's *Quality Standards for Inspection and Evaluation*, issued in December 2020.

Appendix B: Management Comments

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Public Buildings Service

December 08, 2025

MEMORANDUM FOR: ADAM BONFANTI
DIRECTOR
OFFICE OF INSPECTIONS
OFFICE OF INSPECTOR GENERAL (JE)

THROUGH: ANDREW HELLER *Andrew Heller*
ACTING COMMISSIONER
PUBLIC BUILDINGS SERVICE (P)

FROM: MICHAEL GELBER *Michael Gelber*
ASSISTANT COMMISSIONER
OFFICE OF FACILITIES MANAGEMENT (PM)

SUBJECT: Response to the GSA Office of Inspector General Draft
Report Report Number JEF25-001-000

Thank you for the opportunity to review and comment on the Office of Inspector General (OIG) draft report, *Public Buildings Service is Not Providing Oversight of Maintenance for Indoor Firing Ranges in GSA-Owned Buildings*. The Public Buildings Service agrees with the two recommendations presented in the draft report and has provided in Attachment "A" a response to each recommendation.

If you have any questions regarding this information, please contact Martin Gusky, Facility Risk Management Director, Office of Facilities Management, at 202-527-2149.

Attachment

Attachment "A"

Responses to Audit Recommendations

- 1. Coordinate with the tenant agency at the Oroville LPOE range to assess the target retrieval system operation and determine a corrective action plan to address any issues identified**

The Public Buildings Service (PBS) agrees with this recommendation. PBS continues to work with the tenant agency at this land port of entry. PBS is working to procure and install a new target retrieval system. The tenant agency is obtaining the necessary funding to complete this work.

- 2. Develop and issue a comprehensive policy that, at a minimum, establishes roles and responsibilities for the operation and maintenance of the indoor firing ranges; document retention requirements; and comprehensive inspection and cleaning procedures.**

PBS agrees with the recommendation and will develop a policy in accordance with PBS responsibilities for ranges. Please note, as with all tenant maintained equipment in PBS facilities, the operation and use of these ranges is established and controlled by the tenant agency assigned this space in accordance with the tenant agency's own policies.



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