

BEYOND 2020



For more than a quarter century, Public Employees for Environmental Responsibility (PEER) has served Park Service professionals concerned with the mission of national parks. PEER has waged and won some of the highest profile whistleblower cases in the history of the NPS.¹ We have also won key litigation to secure resource protection policies.² Throughout, PEER has been an unrelenting transparency agent, exposing high-level corruption and scores of scandalous lapses in park resource protection.³

This paper lays out some of PEER's ideas for steps that Congress and the National Park Service can take to restore the status of our national parks as the United States' "best idea,"⁴ so that our national parks system can continue to protect and preserve the country's natural and historical heritage for current and future generations.

Beyond 2020: National Park System PEER's Second Century Vision

Introduction

Congress established the National Park Service (NPS) to conserve the scenery, natural and historic objects, and wildlife in the park system and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.⁵

The NPS is now responsible for more than 85 million acres of land and has grown to 419 diverse units, including parks, battlefields, monuments, seashores, scenic trails, recreation areas, the homes of famous Americans, and other historical or ecologically significant areas.⁶ Last year, nearly 320 million people visited national parks, a number roughly equivalent to the total U.S. population.⁷ These areas are of such national significance as to justify special recognition and protection in accordance with various acts of Congress.

In 2016, the National Park Service celebrated its centennial. Yet NPS enters its second century without a clear vision, a coherent plan of operations, and almost a complete absence of internal accountability. For years it has been awash in scandal, beset with a growing maintenance backlog,⁸ facing increased pressure for commercial development, plagued with overcrowding, and bereft of visionary leadership. To address these growing problems in the NPS, PEER will work with current and former NPS employees to focus on protecting wildlife, wilderness, cultural and historic resources, and natural wonders for the enjoyment of current and future generations.

New Leadership

Change starts at the top. The most important issue to address is the lack of effective leadership that has plagued the NPS for decades. This leadership vacuum has worsened considerably during the Trump Administration, which has never nominated a Director for Senate confirmation, relying instead on a series of questionable and illegal temporary appointments.⁹

PEER will tap its network of current and former NPS managers to put forward names of reform candidates who can bring forth the ideals and purpose of the NPS in the next administration, and work to rescind the negative actions taken by recent political appointees. In addition, we will develop confirmation questions to put any nominee on record about many of the topics discussed below. Having a well-qualified, visionary leader is critical to rectify past lapses and to ensure NPS moves forward as a responsible, dynamic, and conservation-minded agency.

Agenda

The next three sections describe the direction we will be pressing NPS to pursue. Our efforts will involve a mix of litigation, legislation, and public advocacy. We will work to increase public awareness of national and regional parks issues, while leveraging legal tools to keep the NPS accountable to its original mandate of protecting natural lands.

1. National Park Planning and Purpose

Restoring Transparent National Park Planning



Planning capacity in NPS has atrophied for lack of use. Now that Congress has passed a new infusion of park funding with the Great American Outdoors Act, it will be important to ensure that NPS does not squander this opportunity. To that end, PEER will push for a commitment that all major parks develop up-to-date general management plans through a public planning process.

Since 1978, every national park unit has been required by law to have a current general management plan (GMP) in place; each plan has a lifespan of up to 20 years. Those plans are intended to clearly establish “measures for the preservation of the area’s resources”¹⁰; steps for addressing transportation and infrastructure challenges; and means for maximizing visitor enjoyment.

PEER examined all 59 National Parks, 19 National Preserves, two National Reserves, 18 National Recreation Areas, and 10 National Seashores. Of these 108 major units, only 51 have current general management plans.¹¹ Several prominent parks, such as Grand Canyon, Yellowstone and

Yosemite, have either no plan at all, or plans that are more than two decades old.¹² In addition, several of the “current” GMPs are approaching the 20-year mark.¹³ As a result, most parks lack overall guidance on budgetary priorities, visitor safety, and wildlife protections.

Failing to set long-term priorities in developing current GMPs is one reason the Park Service maintenance backlog has ballooned to almost \$12 billion—nearly three times the annual NPS budget.¹⁴ Rather than reduce their maintenance backlogs, many parks have instead added to them by investing instead in new or expanded visitor centers, new trails in backcountry, and other developments.¹⁵

An accurate inventory of backlogged natural and cultural resource work is also necessary. As with the NPS maintenance backlog figures, lawmakers and the public need an honest accounting of how much funding is needed for restoration projects. Without a realistic way to articulate the NPS funding needs, crucial projects like research and monitoring in sensitive habitats, or responding to critical issues like invasive species, go ignored.

Another effect of outdated GMPs is the preclusion of public involvement with park planning. Under provisions of the National Environmental Policy Act (NEPA), GMPs are subject to public review and comment, as well as formal consideration of alternatives. Parks lacking GMPs often have program-specific plans (such as traffic control) which do not undergo the NEPA review that requires public participation. Some parks have turned to Resource Stewardship Strategies to make limited updates to park plans, rather than revisit an entire GMP.¹⁶ As outdated GMPs remain in place, the American public is increasingly being shut out of any meaningful role in national park planning.

Curbing Overcrowding: Pushing for Carrying Capacities

PEER is pressing parks to adopt statutorily required carrying capacities.



The National Parks and Recreation Act of 1978 requires “visitor carrying capacities for all areas” of each park unit, in order to protect both park resources and the visitor experience from the negative effects of overcrowding.¹⁷ In some instances, carrying capacity may be a hard limit on the number of visitors. NPS policy also prescribes formal standards to prevent unacceptable overcrowding, such as caps on waiting times to see a park feature, maximum number of encounters on trails, or the ability to camp out of sight or sound range of neighbors.¹⁸ In addition, parks are supposed to monitor conditions and establish indicators

for excess usage, such as soil compaction, exposed tree roots, or vegetation loss.¹⁹

Unfortunately, a PEER survey of the 108 major parks found that almost none have developed carrying capacities.²⁰

Up to this point, the adoption of carrying capacities has been made increasingly difficult by national park leadership’s addiction to overcrowding. Each year seems to set a new visitation record, with many parks more resembling a perpetual traffic jam than a cathedral of nature.²¹ NPS has issued a glowing press release with each new record, suggesting that overcrowding is a measure of national parks’ relevance and worth.²²

Prior to the pandemic, Park superintendents have been stymied in their efforts to adopt carrying capacities. A prime example is Zion National Park, which is paralyzed by ever-growing crowds. But Zion was forced to drop even its anemic reservation plan in the face of opposition from Utah politicians and an order by Interior Secretary David Bernhardt to put the plan “on hold.”²³ Arches had also proposed a reservation system back in 2017, but withdrew it due to a combination of local political opposition and lack of support from the Department of the Interior and NPS Headquarters.²⁴

The COVID-19 pandemic has created a new debate around park carrying capacities with park staff, gateway communities, many visitors, elected leaders, and public health officials expressing concerns about crowds gathering in parks during the pandemic. As a result, Rocky Mountain National Park, the park with the third-highest level of visitors in 2019, adopted a new reservation or timed-entry system to prevent overcrowding as it reopened during the pandemic.²⁵ This approach, however, is not a long-term panacea, as an online timed reservation system can disadvantage those without access the internet, with disabilities, or those without a set work schedule or the ability to plan a visit weeks in advance. Other parks, like Yosemite, are also implementing a reservation system during the pandemic.²⁶ These reservation plans are far from perfect and were adopted without public input in response to an unprecedented health crisis. Nonetheless, they are the first tacit recognition that highly popular park units must do something to curb overcrowding.

In addition, these entry systems will provide important lessons about how to manage park crowds but will need to be refined, and issues such as the number of large tour groups allowed into parks at any one time will need to be addressed. This experience may help wean NPS managers from the ingrained notion that parks can never be loved to death.

Reducing Vehicle-Wildlife Collisions

PEER will be pushing for language to condition funding on requirements that park managers take steps to minimize vehicle-wildlife collisions.

Visitors who come to view wildlife in national parks are a leading cause of those animals’ demise. But as park wildlife-vehicle collisions continue to climb, many parks take no preventative measures. Nor does the NPS have any policies or guidance addressing roadkill.²⁷

In Yellowstone, the average number of grizzly bear deaths from vehicle collisions has doubled in the two decades since 2000, while collisions involving bison and black bears have risen nearly 50% during the same period.²⁸ Rather than take action to mitigate collisions, Yellowstone has made road improvements such as widening roads and increasing the number of pull-outs for slower traffic—which have led to higher vehicle speeds. The park had no record of any study or planning on the issue, aside from reviews required under the Endangered Species Act.²⁹ Similarly, Yosemite has seen 300 collisions with black bears in a ten-year period but does not systematically collect data on other species.³⁰

By contrast, Grand Teton has invested significant resources in order to analyze and reduce these usually fatal interactions. The park tracks vehicle impacts for 24 different species and analyzes the circumstances of accidents—time of day, traffic volume and speed, and origin.³¹ For example, the park discovered that roughly a quarter of the drivers were local residents, often commuting rather than sightseeing. Prior to the short tenure of David Vela as superintendent, Grand Teton proactively implemented and tested an array of mitigation measures, including reducing speed limits at night, when most collisions occur, installing variable message signs, and increasing the presence of U.S Park Rangers to enforce speed and other traffic regulations.³² Those efforts

illustrate that high levels of animal-vehicle collisions are not inevitable, but rather a behavioral issue that can be managed.

We will work to draw new attention to the extent of national park roadkill and steps park managers can take to reduce this carnage. Since federal appropriations provide the bulk of support for transportation infrastructure in national parks, elected representatives can influence park road planning. Allowing public access to the park transportation planning process will also enable the public to weigh in on best practices that park superintendents should consider or adopt.

2. National Park Mission and Mandates

In addition to its abdication of transparent planning, NPS has long ignored several critical resource protection laws. Securing compliance with these laws is an important component of our park reform agenda.

Return to the Wilderness Mandate

National park wilderness contains some of the most magnificent wild land in our nation, or, for that matter, the world. The 44 million acres of designated park wilderness comprise more than half of all the lands within our park system and more than 40% of all federal lands within the National Wilderness Preservation System.³³

Despite this superlative profile, successive administrations and the NPS have turned their backs on park wilderness. The agency has failed to forward a score of wilderness proposals and eligibility determinations to the Secretary and the President, conduct legally-mandated wilderness assessments, revise legally-insufficient wilderness assessments, prepare wilderness management plans, or take myriad other necessary steps to protect wilderness resources.³⁴ The process of securing statutory protection for an enduring resource of park wilderness has essentially stopped dead in its tracks.

All told, acting upon long-pending or stalled wilderness proposals and recommendations would increase park wilderness land by more than half, putting at least an **additional 26 million acres under wilderness protection**.³⁵



Absent wilderness designation, park backcountry is protected only by agency policies, which may be waived. A good example of the impact of the short-circuited wilderness agenda is the Obama administration effort to open national park trails outside of developed areas to bicycles,³⁶ and the Trump administration's recent effort to allow electric bicycles on those same trails. Opening national park trails to e-bikes puts fast, mechanized transport deep into park backcountry, disturbing wildlife and adding to an already large, unfunded backlog of trail

maintenance work.³⁷ It will also lead to more, and more serious, accidents on trails where e-bikes are allowed, including dangerous conflicts with other users, such as horseback riders. Allowing e-bikes also invites other lobbyists to win permission to add electric skateboards, electric scooters, mopeds, hoverboards, and motorized three-wheelers onto trails into parks' backcountry.

Fulfilling the NPS wilderness mandate will thus yield several important benefits, such as:

- Precluding commercial intrusion into park wild lands by outlawing the construction of more transmission towers, pipelines, cell phone towers, and other structures;
- Strengthening park air quality protections by extending the scope of prevention of significant deterioration (PSD) guarantees; and
- Preventing mechanized recreation, such as e-bikes, from penetrating park backcountry.

PEER is pursuing a three-pronged effort to return park wilderness to the gold standard for wilderness in America. To that end, we are:

1. Finalizing legislation and appropriation language to resuscitate 17 unenacted wilderness recommendations and six untransmitted wilderness proposals and move forward with wilderness reviews in dozens of other parks.³⁸
2. Mounting efforts to protect existing wilderness. Guided by employees on the scene, PEER is stepping up its interventions to halt wilderness violations committed or condoned by NPS managers.
3. Restoring a moribund wilderness program. Today, NPS lacks a comprehensive overview of its wilderness needs. At present, NPS devotes less staff time to managing the national wilderness program than any other federal land management agency, even though NPS administers more wilderness acres than any other agency.³⁹

Reclaiming Park Skies

For years, parks have sought to limit overflights but could not proceed without action from the Federal Aviation Administration—which was never forthcoming. Last year saw more than 47,000 park overflights, with some parks, such as Hawaii Volcanoes, seeing up to 80 flights per day.⁴⁰

Capping a three-year PEER litigation battle, in May 2020, the United States Court of Appeals for DC ordered the FAA and NPS to adopt limits on noisy air tours in 23 National Parks within the next two years.⁴¹ The case involves the long-standing failure of the agencies to produce an Air Tour Management Plan as required by the National Park Air Tour Management Act of 2000 in any park.⁴²

The PEER suit ends this bureaucratic stalemate and directs the adoption of management plans for the 23 parks with the highest overflight traffic, including Glacier, Bryce Canyon, Death Valley, Great Smoky Mountains, Mount Rainier, Mount Rushmore, Lake Mead, and Muir Woods.⁴³

In coming months, PEER will be working with parks and affected communities to, at long last, responsibly limit tourist overflights. A key group will be the NPS biologists whose data on aircraft disturbance of wildlife will factor into air tour decision-making, but questions remain about whether the data is adequate and current enough to rely upon.

Stop Decline of Law Enforcement Rangers

PEER is pressing NPS to protect park resources, visitors, and residents by following its own policies for law enforcement staffing.

Within National Parks, Law Enforcement Rangers are the primary public safety agency, tasked with enforcing all federal laws as well as regulations that govern NPS lands. They also carry out duties including search and rescue operations, emergency medical services, and firefighting.

But while new parks are added and park visitation balloons to new records, the number of rangers protecting park wildlife, resources, and visitors is steadily shrinking. A lack of budgetary stability, any real planning capacity, or overall leadership in the NPS law enforcement program aggravates these diminishing resources. Without an ability to enforce park safeguards, NPS is increasingly incapable of fulfilling its basic mandate—conserving park resources and protecting both those resources and the visitors who come to enjoy them.

From 2011 through 2019, Park Protection staff levels have fallen 20%, with 613 fewer rangers and full-time emergency services staff.⁴⁴ The ranks of seasonal rangers covering peak months have dropped by a similar amount.⁴⁵

These declines violate a 2002 NPS policy of “no net loss” in law enforcement ranger staffing levels.⁴⁶ In addition, almost no parks are performing a Law Enforcement Needs Assessment, as required every three years by NPS policy.⁴⁷ This means that parks do not have a dedicated law enforcement budget, and park superintendents set the law enforcement level in their parks with no real oversight from above or input from the field.

In addition, PEER is continuing our effort to induce NPS to adopt a reliable system for reporting and compiling crimes or other incidents. Every year since 1995, PEER has submitted Freedom of Information Act requests to NPS and other federal land management agencies seeking numbers of threats against or attacks on their staff and facilities.⁴⁸ Alone among these agencies, NPS does not track attacks on non-law enforcement personnel.⁴⁹

Another key issue is the lack of adequate screening and training for new rangers and equipment once they are in the field.⁵⁰ U.S. park rangers have one of the most dangerous jobs in federal service: they exercise full police powers, but often lack backup support when working in sparsely-populated backcountry. PEER is asking the Congressional oversight committees and National Park Leadership to ensure all Law Enforcement officials are properly screened, trained at the Federal Law Enforcement Training Center, and receive proper support and evaluation throughout their employment. In addition, a clear line of authority should be established from park rangers to Washington, D.C., rather than to park superintendents who lack law enforcement training and may not understand the dangerous situations rangers face.⁵¹

3. Non-Mandated Steps to Protect Parks

Beyond statutory mandates, NPS and its superintendents have broad management discretion on a number of issues. PEER acts as a watchdog on these issues, to ensure that internal park management decisions are open to public and institutional review when appropriate.

Protect Park Wildlife

Under recent administrations, Interior agencies including NPS have surrendered federal primacy in wildlife management and deferred to state game rules.⁵² State game rules, like those for the Mojave National Preserve in California, are often geared toward selling hunting licenses and targeting predators to increase prize game, not protecting intact ecosystems.⁵³ In some of these incidents, NPS officials are barred from interpleading with states or other outside entities, and in

those instances PEER is recruited to play that role. Repeal of these policies will be a PEER priority in the next administration.

Part of that effort will be documenting the impact that hunting and trapping outside park boundaries has on park wildlife, as is happening in Alaska. Through insiders, PEER has obtained NPS studies that show the significant impact that hunting and trapping outside Denali National Park and Preserve is having on the viability of wolf packs inside Denali. Not only are wolf family groups disrupted, but visitor-viewing success inside Denali—Alaska’s top tourist attraction, drawing more than half a million annual visitors⁵⁴—has plummeted as well. The studies show that a visitor’s chances of seeing wolves in the wild inside Denali dropped to 1% in 2019, down from viewing success rates as high as 45% in 2010.⁵⁵

Similarly, at Yukon-Charley Rivers National Preserve, hunting has so decimated wolf packs that in 2016 the NPS had to end a more than 20-year research program on predator-prey relationships.⁵⁶ Its scientists found that the wolf population in the 2.5 million-acre national preserve was “no longer in a natural state,” nor were there enough survivors to maintain a “self-sustaining population.”⁵⁷



PEER has and will continue to press Alaska game authorities to restore no-trapping buffer zones around NPS units. In addition, we will continue our efforts to prevent Alaska from spending federal Pittman-Robertson aid on predator control.⁵⁸ Lastly in this regard, we will keep monitoring research showing that state predator programs do not increase populations of elk, moose, and other game animals.⁵⁹

We also expect that the Trump Administration’s reversal of wildlife protection in Alaska preserves which allow hunting will be overturned. This will end the introduction of questionable and unethical practices such as shooting bears, wolves, and their offspring in their dens during hibernation, and hunting bears over bait.

More broadly, we will press NPS to oversee hunting and trapping in those units where it is allowed and to take overdue regulatory steps like prohibiting lead ammunition. There are approximately 62 parks in which Congress authorizes recreational hunting, and a smaller subset of the 62 where Congress authorizes trapping. NPS Management Policies provide that each park in which Congress authorizes recreational hunting or trapping must promulgate special regulations to govern that activity.

These special regulations are necessary to ensure that hunting or trapping does not harm park wildlife, including non-target species. For example, so-called “varmint” hunting in Mojave National Preserve attracts scavengers, most notably ravens, which also prey on young endangered Mojave tortoises. PEER will continue to press Mojave to undertake its responsibilities to better manage hunting.

While many parks have shown vision and responsibility by adopting special regulations that govern hunting, today, approximately 40 parks have failed to adopt the special regulations and are in violation of the Management Policies. PEER will work to reduce or eliminate the ranks of these “non-conforming 40.”

Temporarily Halt New Cell Towers

National parks are getting wired, despite rising concerns about impacts to scenery, soundscapes, and serenity. The cellular footprint inside the national park system is spreading, with whole networks of cell towers springing up in some of America's grandest parks, including both Grand Teton (with nine new towers) and Grand Canyon (with five towers slated for approval), as well as emerging proposals from Olympic, Crater Lake, Lake Mead, and Bryce Canyon.⁶⁰

In 2019, a detailed PEER complaint prompted an audit by Interior's Inspector General that found widespread malfeasance in park management of commercial cellular facilities, citing failure to comply with environmental laws, collect the proper revenue, and involve the public in required planning processes.⁶¹ Unfortunately, in the succeeding months, NPS has greenlit cell towers at a quickening⁶¹ Now, instead of approving one tower at a time, parks are okaying entire networks in one fell swoop.⁶²

PEER is documenting adverse impacts, such as:

- Significant spillover of cell signals into park wilderness and backcountry, deeply penetrating cathedrals of nature with human noise;
- Growing scenic impacts of multiple large metal mono-poles, outside antennas, and microwave dishes; and
- Rampant NEPA violations, as significant additions are approved with Categorical Exclusions or official findings of "No Significant Impact" despite substantial concerns raised.



Currently, NPS does not know how many cell towers have already been installed or how many are in the pipeline. The agency told the Inspector General it would complete an inventory by the end of 2020,⁶³ but is plowing ahead with more facilities in the meantime. Ironically, although these recent approvals tout modernization, none accommodate 5G (Fifth Generation) cell service,⁶⁴ and telecoms will soon be pushing for upgrades on what has just been installed.

PEER is pressing NPS for a temporary halt, or a moratorium, on new approvals of cell towers and networks until NPS completes its inventory and assesses the systemic violations of resource protection laws and policies.

Implement “Green Parks”

Under President Obama, NPS prepared a draft “Green Parks” plan that required parks to shrink their carbon footprint, reduce pollution, and increase recycling.⁶⁵ One plank of the plan required that 75% of parks go plastic-free by 2016—and 100% by 2020—through a requirement that their concessioners stop selling disposable plastic water bottles.⁶⁶

Unfortunately, the Green Parks plan was never implemented. As PEER revealed, Coca-Cola, maker of the top-selling bottled water brand (Dasani), persuaded the Secretary of the Interior to prevent Grand Canyon from finalizing a long-planned bottle ban.⁶⁷ The resulting publicity pushed NPS to ultimately allow Grand Canyon's ban to go forward and to institute a process for other parks to follow suit.⁶⁸

Even the weakened Green Parks policy did not survive. The 75% plastic-free goal was also jettisoned.⁶⁹ At the time it was rescinded by Trump appointees under pressure from International Bottled Water Association, only 23 parks had implemented bottle bans—including, however, some of the most visited parks, such as Grand Canyon and Zion.⁷⁰ Currently, park superintendents are forbidden from restricting plastic bottle sales.⁷¹

Plastic bottles are the single biggest contributor to the surging waste streams in our national parks. Parks now not only have one fewer effective tool for coping with daily mountains of trash, they no longer have any internal impetus to make their operations more sustainable, less wasteful, and greener.

With a new administration, PEER will dust off the original discarded Green Parks plan and push for its adoption and implementation.

Conclusion

The United States' National Park System is an incomparable natural resource. Without competent and visionary leadership both within the agency and in Congress, our park system will continue to decline. By working on the issues outlined in this paper, PEER and its allies can help return the Parks to what they can and should be: America's best idea.

¹ See, e.g., <https://www.peer.org/teresa-chambers-restored-as-chief-of-the-u-s-park-police/>;
<https://www.peer.org/rob-danno-ranger-danger/>

² See, e.g., <https://www.peer.org/park-service-rescinds-approval-of-mojave-guzzlers/>.

³ See, e.g., <https://www.peer.org/national-parks-illegal-non-profit-network/>; <https://www.peer.org/culture-of-corruption-persists-inside-park-service/>; <https://www.peer.org/park-service-misled-the-public-on-plant-harvest-plan/>; <https://www.peer.org/park-service-reneges-on-promised-cell-restrictions/>

⁴ See <https://www.nps.gov/americasbestidea/>

⁵ <https://www.govinfo.gov/content/pkg/USCODE-2015-title54/html/USCODE-2015-title54.htm>
Section 100101

⁶ <https://www.nps.gov/articles/quick-nps-history.htm#:~:text=This%20%22Organic%20Act%22%20states%20that,purpose%20is%20to%20conserve%20the>

⁷ See <https://www.nps.gov/aboutus/faqs.htm>

⁸ See <https://www.peer.org/evaporating-national-park-staff-levels/>;
<https://www.nps.gov/subjects/infrastructure/maintenance-backlog.htm>;
<https://www.nationalparkstraveler.org/2018/09/traveler-special-report-tackling-national-park-services-maintenance-backlog>.

⁹ See <https://www.peer.org/lawsuit-threat-on-illegal-interior-appointments/>.

¹⁰ 54 U.S.C.S. § 100502(1) (LEXIS through PL 116-145, approved 6/17/20).

¹¹ See <https://www.peer.org/rudderless-national-parks-adrift-without-a-compass/>.

¹² See, e.g., <https://www.nps.gov/grca/learn/management/gmp.htm> (Grand Canyon's GMP: 1995);
<https://www.nps.gov/yose/getinvolved/planning.htm> (Yosemite's GMP: 1980).

¹³ See, e.g., <https://www.nps.gov/bibe/learn/management/gmp.htm> (Big Bend's GMP: 2004);
<https://www.nps.gov/crla/getinvolved/planning.htm> (Crater Lake's GMP: 2005).

¹⁴ See <https://www.peer.org/rudderless-national-parks-adrift-without-a-compass/>.

¹⁵ See *id.*

¹⁶ See, e.g., <https://www.nps.gov/articles/denali-resource-stewardship-strategy.htm>;
https://www.nps.gov/seki/learn/management/upload/RSSsummary_final-508.pdf;
https://www.nps.gov/gumo/learn/management/upload/GUMO-Final-RSS-Combined-PDF-July-09_WEB.pdf.

¹⁷ 54 U.S.C.S. § 100502(3) (LEXIS through PL 116-145, approved 6/17/20).

¹⁸ See <https://www.peer.org/reopened-national-parks-must-curb-overcrowding/>.

-
- ¹⁹ See <https://www.peer.org/national-parks-punt-on-overcrowding/>.
- ²⁰ See *id.*
- ²¹ See <https://www.peer.org/park-ranger-force-continues-shriveling-as-visitation-swells/>.
- ²² See, e.g., <https://www.nps.gov/orgs/1207/2019-visitation-numbers.htm>.
- ²³ See *id.*; see also <https://www.peer.org/zion-explores-cap-on-number-of-visitors-as-other-parks-fiddle/>.
- ²⁴ See <https://www.peer.org/blog-national-parks-stumble-towards-reforms/>.
- ²⁵ See *id.*
- ²⁶ See *id.*
- ²⁷ See <https://www.peer.org/visitors-exact-heavy-toll-on-national-park-wildlife/>.
- ²⁸ See *id.*
- ²⁹ See *id.*
- ³⁰ See *id.*
- ³¹ See *id.*
- ³² See *id.*
- ³³ See <https://www.peer.org/areas-of-work/public-lands/orphaned-park-wilderness/>.
- ³⁴ See *id.*
- ³⁵ See *id.*
- ³⁶ See <https://www.peer.org/park-backcountry-thrown-open-to-mountain-biking/>.
- ³⁷ See <https://www.peer.org/national-parks-illegal-rush-e-bikes/>.
- ³⁸ See <https://www.peer.org/areas-of-work/public-lands/orphaned-park-wilderness/ten-steps-national-park-wilderness/>.
- ³⁹ See <https://www.peer.org/top-national-park-wilderness-official-resigns-in-frustration/>.
- ⁴⁰ See <https://www.peer.org/promised-crackdown-on-park-overflights-yet-to-take-off/>.
- ⁴¹ See <https://www.peer.org/court-orders-limits-on-national-park-air-tours/>.
- ⁴² See *id.*
- ⁴³ See https://www.peer.org/wp-content/uploads/2020/05/5_1_20-Court-Decision-Overflights.pdf.
- ⁴⁴ <https://www.peer.org/evaporating-national-park-staff-levels/>.
- ⁴⁵ See *id.*
- ⁴⁶ See <https://www.gao.gov/assets/250/249569.pdf>, p. 33.
- ⁴⁷ See https://www.nps.gov/policy/Redacted_RM-9.pdf, p. 4.
- ⁴⁸ See, e.g., <https://www.peer.org/drop-in-reported-violence-vs-federal-employees-in-the-west/>.
- ⁴⁹ See *id.*
- ⁵⁰ See <https://www.peer.org/park-service-to-cut-law-enforcement-ranger-training/>.
- ⁵¹ See Appendix 1 for a fuller list of necessary changes to the ranger program.
- ⁵² See <https://www.peer.org/national-park-hunting-and-fishing-restrictions-under-fire/>.
- ⁵³ See *id.*
- ⁵⁴ <https://www.nps.gov/dena/learn/nature/visitor-trends.htm>
- ⁵⁵ See <https://www.peer.org/chances-of-seeing-denali-wolves-in-the-wild-now-remote/>.
- ⁵⁶ See <https://www.peer.org/alaska-game-agents-decimate-national-park-wolf-packs/>.
- ⁵⁷ See *id.*
- ⁵⁸ See <https://www.peer.org/move-to-end-federal-funding-of-alaska-predator-control/>.
- ⁵⁹ See, e.g., <https://www.peer.org/alaska-pares-its-predator-control-program/>.
- ⁶⁰ See <https://www.peer.org/national-parks-seek-ubiquitous-cell-coverage/>.
- ⁶² See <https://www.peer.org/national-parks-seek-ubiquitous-cell-coverage/>.
- ⁶³ See *id.*
- ⁶⁴ See <https://www.peer.org/grand-teton-cell-mega-expansion-violates-law-and-policy/>.
- ⁶⁵ See generally https://www.nationalparkstraveler.org/sites/default/files/attachments/green_parks_strategic_plan_04.12.10.pdf (archived version).
- ⁶⁶ See *id.*, pp.24-25.
- ⁶⁷ See <https://www.peer.org/yellowstone-struggles-with-rising-tide-of-plastic-waste/>.
- ⁶⁸ See *id.*
- ⁶⁹ See generally <https://www.nps.gov/subjects/sustainability/upload/NPS-Green-Parks-Plan-2016.pdf>.
- ⁷⁰ See <https://www.peer.org/how-park-ban-on-plastic-bottles-got-throttled/>.
- ⁷¹ See *id.*

Appendix 1

Necessary Changes to Law Enforcement Ranger Program

1. Implement pre-employment psychological screening for prospective law enforcement personnel.
2. Review background investigation procedures to assure that all law enforcement personnel (including support personnel) have successfully completed a full investigation prior to appointment.
3. Mandate attendance at the Federal Law Enforcement Training Center's (FLETC) Basic Land Management Training academy in Brunswick, GA (or authorized satellite campus) for permanent law enforcement rangers prior to field assignment. This will require the NPS to work with the FLETC to expand training capacity at this national facility to accommodate both current and future demands.
4. Expand curriculum at the basic academy to include greater emphasis on:
 - Officer safety tactics and the use-of-force, de-escalation techniques, and monitored scenarios that aid in developing skills necessary to confront real-life law enforcement challenges;
 - Development of skills necessary to identify, confront, and report witnessed employee misconduct and ethical breaches;
 - The ability to independently research, understand, and apply complex legal issues (e.g., statutory analysis, case law and congressional/regulatory intent, etc.) affecting federal criminal law.
5. Assure that formalized "field training" is successfully completed by all permanent rangers immediately after completion of the FLETC basic academy and prior to their permanent assignment.
6. Establish/implement a system of pre-promotional testing for all personnel seeking advancement into progressively more senior supervisory or management-level law enforcement positions. Testing results should be a screen-out factor in the selection of supervisory and/or management level law enforcement personnel. Testing must assure that individuals responsible for supervising or managing law enforcement personnel and programs possess the advanced levels of knowledge and understanding of legal, policy, and related issues necessary to effectively supervise or manage law enforcement operations.
7. Limit training provided at the various "seasonal law enforcement academies" to seasonal law enforcement rangers *only*. Training received at those institutions should not be used in place of mandated training at the FLETC for seasonal rangers who transition to permanent positions. [PEER has previously identified glaring deficiencies](#) in many of these seasonal law enforcement training programs. To address these deficiencies, greater oversight needs to be exercised over those programs that remain in operation.
8. Reduce reliance on seasonal law enforcement rangers in place of their permanent (and presumably more experienced/better trained) counterparts. Seasonal rangers should be used solely to supplement and support their permanent counterparts, under close supervision, rather than as front-line, primary responders.
9. Impose standardized "testing components" to mandated in-service law enforcement training to assure that lessons taught are actually learned, with emphasis on both legal updates and practical skills/scenarios.
10. Establish closer line-authority from the Washington, D.C. office over all park law enforcement operations, to assure greater operational consistency and compliance with national policies, especially with respect to conduct and performance.

11. Assure that, prior to retirement, all public safety personnel go through an exit medical review for PTSD and work-related exposures that may have impacts on future health. This process should include an evaluation for potential work-related disabilities.