



## **OUTSIDE WITNESS TESTIMONY IN SUPPORT OF INCREASING STAFFING LEVELS IN PUBLIC LAND USE AGENCIES**

**Submitted by: Public Employees for Environmental Responsibility**

**Prepared for: The Senate Appropriations Subcommittee on Interior, Environment, and Related Agencies**

**Addressing: The Department of the Interior**

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Dear Chair Merkley, Ranking Member Murkowski, and Members of the Senate Appropriations Subcommittee on Interior, Environment, and Related Agencies:

Thank you for the opportunity to submit testimony regarding appropriations for the Department of the Interior (“DOI”) and its agencies, namely the National Park Service (“NPS”), Bureau of Land Management (“BLM”), and Fish and Wildlife Service (“FWS”). We believe public land use agencies are underfunded and require increases in staffing, particularly ranger positions.

Public Employees for Environmental Responsibility (“PEER”) is a nonpartisan, nonprofit, service organization for environmental and public health professionals, land managers, scientists, enforcement officers, and other civil servants dedicated to upholding environmental laws and values. We work with current and former federal, state, local, and tribal employees who seek a higher standard of environmental ethics and scientific integrity within their agencies.

First, PEER will address NPS. Since 1916, NPS has been charged with an essential task: preserving the nation’s most awe-inspiring vistas and iconic wildlife, while keeping the parks “unimpaired for the enjoyment of future generations.”<sup>1</sup> More than a century later, pressures within and beyond park boundaries threaten the future of the parks’ natural beauty and ecosystems. In order to uphold the conservation legacy of national parks, Congress must invest in agency staffing.

The current trajectory of park expansions and overcrowding, without commensurate increases in staffing, is unsustainable. Between 2010 and 2020, NPS lost 5,935 employees, 29 percent of the 20,813 staff that remained in 2020.<sup>2</sup> Park visitation rebounded following the 2020 pandemic when many parks were closed. In 2021, the 45 most popular parks set attendance records. Despite record levels of visitation, increasing search and rescue operations, and rising crime, the number of rangers in our national parks has steadily declined. Since 2005, the ranks of permanent law enforcement rangers fell by 15 percent, while seasonal law enforcement rangers deployed during peak seasons dropped by 30 percent.

In 2021, PEER released the NPS Voices Tour 2018 Summary Report. The report was compiled by Sepler and Associates and was intended to empower NPS employees to speak out

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<sup>1</sup> <https://www.nps.gov/grba/learn/management/organic-act-of-1916.htm#:~:text=%22...to%20conserve,of%20the%20National%20Park%20Service.>

<sup>2</sup> [https://therevolvingdoorproject.org/wp-content/uploads/2022/01/Climate-Capacity-Crisis\\_-Attrition-at-Climate-Agencies-and-Immediate-Steps-to-Address-It.pdf.](https://therevolvingdoorproject.org/wp-content/uploads/2022/01/Climate-Capacity-Crisis_-Attrition-at-Climate-Agencies-and-Immediate-Steps-to-Address-It.pdf)



about their work environments. The report identifies multiple issues arising from the increase in park visitation and increase in job responsibilities and decreased budgets. The report calls working conditions “sub-par” and recommends “Alignment between Budgets and Expectations.” “In the face of smaller budgets, participants urge that expectations and priorities reflect reduced capacity. Alternatively, they call for full funding for the priorities currently identified.”<sup>3</sup>

One of the major themes that the report highlights is the issue of staffing. “Overwhelmingly, participants speak out about understaffing of parks and its consequences. At all levels, they describe the parks as stretched to breaking with workers being asked to work many uncompensated hours and overwork causing sickness, stress, lack of morale, and safety problems. Frequent ‘acting’ positions, often poorly staffed, also disrupt any attempt at stability in the parks. Many believe that chronic understaffing and the failure to match qualifications to positions contribute to disrespectful, abusive, and harassing behavior. Furthermore, the administrative demands on supervisors prevent them from spending time interacting with and supervising their staff.”<sup>4</sup>

“We heard voices from people wearing thin from being asked to perform at a high level in the face of inadequate resources, competing demands, and in some cases work environments rendered extremely stressful due to interpersonal behavior.”<sup>5</sup> To correct these problems, supervisors said NPS must increase its permanent staff. Supervisors reported perpetual turnover led to constant onboarding and training, loss of institutional knowledge, and a lack of continuity.<sup>6</sup>

We cannot keep asking NPS staff to meet current and future challenges without adequate resources and support. Instead, we need to build and expand a core workforce equipped with the tools to tackle the complex management problems parks face. The Biden administration’s proposed budget for Fiscal Year 2023 provides for a slight increase in NPS hiring but with almost nothing targeted for its depleted ranger force. PEER is asking Congressional appropriators to:

- Prioritize visitor and resource protection among NPS operational budget increases; and
- Require NPS to implement its own policy requiring the application of consistent standards for determining appropriate force levels.

Next, we shift our focus to BLM. BLM manages more than 245 million acres of public lands (10.5 percent of all land in the country, the most of any federal agency).<sup>7</sup> Both in conserving and restoring habitat at the surface and holding mineral prospectors to the highest of environmental standards, BLM can protect biodiversity and slow the climate crisis by decreasing overall U.S. greenhouse gas emissions.

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<sup>3</sup> <https://peer.org/nps-voices-summary-report-06-06-2019-pdf/> at 4.

<sup>4</sup> *Id.* at 3.

<sup>5</sup> *Id.* at 10.

<sup>6</sup> *Id.* at 15.

<sup>7</sup> <https://www.blm.gov/about/what-we-manage/national>.



Like NPS, BLM is experiencing significant increases in visitation coupled with concerning reductions in agency staff. In 2010, BLM estimated it had 58,570,000 recreational visits<sup>8</sup> on BLM-administered lands. By 2020, that number rose to 73,110,000, nearly a 25 percent increase in one decade. In contrast, in 2010, BLM employed just over 11,000 full time employees (FTE)<sup>9</sup>, but by 2020 it fell to 9,458 FTE<sup>10</sup>, more than a 14 percent decrease in the same time period. Currently, BLM employs 8,800 FTE, amounting to one employee for every 31,499 acres.

An instructive example of the on-the-ground impacts of growing visitation and reduced staff is the Red Rock Conservation Area just outside of Las Vegas, Nevada. There, red rock formations in the sandstone draw visitors from the sprawling metropolis to off-road, mountain bike, and hike. Staffing levels in the conservation area have remained flat as visitation has increased from 200,000 visitors per year in the 1980s to 3.5 million in 2020. The acreage in the conservation area itself has also more than doubled during that time. As crowds and lands have grown without commensurate increases in staffing, infrastructure and staff have struggled to match the challenges posed by increased visitation. Unauthorized mountain bike trails now tear through important historical and cultural sites. Graffiti mars canyon walls. Cultural sites face an accumulation of trash and increased looting.

Overall, the dedicated members of BLM's staff cannot be expected to maintain their diligent oversight of the 245 million acres of public lands in their charge with fewer employees and more responsibilities. PEER is asking Congressional appropriators to:

- Increase BLM staffing to a total of 15,000 FTE. This recommendation comes with the support of current BLM employees and is supported by a former BLM Director.

Lastly, PEER will discuss FWS. FWS works to conserve, protect, and enhance fish, wildlife, plants, and their habitats for the continuing benefit of the American people.<sup>11</sup> The agency oversees more than 560 National Wildlife Refuges, 70 national fish hatcheries, numerous regional and field offices across the country, and thousands of active conservation projects.<sup>12</sup> FWS employs over 8,400 staff members currently.<sup>13</sup> In Fiscal Year 2021, FWS employed 641 commissioned law enforcement rangers and special agents, both permanent and seasonal. Comparatively, FWS employed 662 commissioned law enforcement rangers and special agents, both permanent and seasonal, in Fiscal Year 2011. With increased visitation across all public land use agencies, PEER is concerned about staffing decreases in FWS.

Overall, DOI must address the widening gap between personnel resources and demand by increasing its staff, specifically rangers. Rangers within the public land agencies are charged with a variety of essential tasks, ranging from park interpretation to search and rescue operations to investigating criminal activity. In general, they help facilitate park enjoyment and guarantee

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<sup>8</sup> <https://www.blm.gov/sites/blm.gov/files/docs/2021-08/PublicLandStatistics2020.pdf>.

<sup>9</sup> [https://www.westernwatersheds.org/wp-content/uploads/2021/10/FY2012\\_BLM\\_Greenbook-2.pdf](https://www.westernwatersheds.org/wp-content/uploads/2021/10/FY2012_BLM_Greenbook-2.pdf).

<sup>10</sup> <https://www.doi.gov/sites/doi.gov/files/fy2022-blm-budget-justification.pdf>.

<sup>11</sup> <https://www.fws.gov/>.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*



public safety. The reduction of rangers in our land use agencies, timed with record visitation, has adverse public safety consequences. Across DOI, criminal referrals for prosecution dropped 70 percent (from 6,082 down to 1,812), prosecutions filed off those referrals fell 67 percent (from 4,233 to 1,381), and convictions secured declined 74 percent (from 3,328 to 919).<sup>14</sup> With fewer rangers employed to patrol public lands, law enforcement and public safety efforts fall significantly. PEER is asking Congressional appropriators to:

- Ensure that NPS, BLM, and FWS law enforcement staffing levels are funded to the level they were a decade ago in 2012. This would be a modest but significant bump from current levels; and
- Add report language requiring the three agencies to report back to the Subcommittee on their assessment of law enforcement needs for Fiscal Year 2024, including the specific steps they have taken to implement the recommendations from the Government Accountability Office report.<sup>15</sup>

Americans across the country have rediscovered the beauty and awe of public lands, and with each visit they are reminded of how integral these places are to our national identity. In order to preserve these natural spaces for future generations, NPS, BLM, and FWS require increases of their most important resource: people. Increased staff can help agencies maintain their missions and support the communities that are in and near these lands by providing local, good-paying jobs. PEER is proud to support these efforts, and we ask Congressional appropriators to demonstrate theirs by:

- Granting public land use agencies the full funding that they have requested, plus an additional 20 percent for more staffing.

Thank you for your work on this issue thus far, and for considering this testimony regarding increased staffing in DOI's public land agencies in Fiscal Year 2023.

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<sup>14</sup> Interior Criminal Enforcement 1986-2021 (generated by TRACFED, <https://trac.syr.edu/infoTRACFED.html>).

<sup>15</sup> <https://www.gao.gov/products/gao-20-171t>.