

Blue Goose Alliance Bulletin

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Alliance Speaks Out on Refuge Law Enforcement Issue

Recently, Alliance President Noreen Clough sent a letter to Interior Secretary Gail Norton expressing the opinion of the Alliance regarding the law enforcement program within the National Wildlife Refuge System. Below is the text of that letter.

The Honorable Gail Norton
Secretary of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Norton:

The Blue Goose Alliance, a relatively new national conservation organization, is committed to informing members of Congress, the public, and others about the urgent needs of the National Wildlife Refuge System. Our members include numerous individuals from ranks of the "Refuge Friends" groups across the country as well as many previous Refuge System administrators and managers with several hundred years of experience in the U. S. Fish and Wildlife Service (Service).

As a nationwide organization committed to protecting one of this country's greatest treasures, the National Wildlife Refuge System, we support your objective of developing and maintaining the most professional, modern, and effective law enforcement capability in a civilian government agency and applaud your endorsement of the recommendations of the Department's Law Enforcement Review Panel. We believe these recommendations will go far to provide greater protection of refuge resources, employees, and the visiting public.

Accordingly, we support your commitment to enhance the accountability and professionalism of Refuge law enforcement (LE), and agree with the Panel's recommendations that ensure that all non-LE managers with line authority over LE personnel have and maintain Critical Sensitive Clearance and complete "law enforcement for supervisors" training.

We also welcome the establishment of an Internal Affairs Unit and development of a centralized recruitment system. We commend the Panel's recommendation to identify staffing shortages that impact officer safety and to address the shortages immediately, and we are pleased with the Service's efforts to review, revise, and strengthen the Service Manual's law enforcement chapters.

We acknowledge the need for Refuges to shift to greater reliance on full-time officers and less reliance on collateral-duty and seasonal officers. We also welcome the piloting of the Zone Officer model, and the development of the Law Enforcement Deployment and Assessment model.

We believe Refuge Managers not only concur with the majority of the recommendations of the various reports, but also think they have been proactive in implementing these recommendations at the field level. In recent times, the number of full-time officers in the Refuge System has increased from 62 in 2000 to 86 in 2002, with plans to hire another 25 new full-time officers in 2003. The number of collateral duty officers within the Service has been reduced significantly.

Until recently we felt that the Service had taken action and made significant progress in fulfilling many of your directives to improve Law Enforcement within the Department. However, on July 16, 2003, the Service approved and implemented Director's Order No. 155: National Wildlife Refuge System Law Enforcement Program Reforms. This order addresses a number of reform measures relative to the organizational structure of the Refuge System LE program, implementation of the Zone System, and central recruitment for full-time refuge officer positions.

Although we generally support the changes associated with the reforms, we do not support measures identified under Section 5 of Order No. 155 that change how the Refuge System will manage collateral-duty law enforcement officers. We feel these reforms have potential to adversely impact management of the Refuge LE program, as well as adversely impact the natural and public resources they are charged to manage and protect.

Specific elements of Section 5 that generate concern are the 25-50% law enforcement activity requirement for collateral-duty officers and the requirement that GS 14 and 13 Refuge Managers relinquish their law enforcement authority effective October 15. These actions will result in significant reduction in the Refuge System's law enforcement capability through the loss of direly needed officers and the removal of managers and supervisors from direct participation in the refuge law enforcement program.

The 2000 International Association of Chief of Police report plainly identifies the need for collateral duty officers, and the 2002 Inspector General's recommendations on law enforcement identify the importance of managers and supervisors with a law enforcement background and or experience.

It is our opinion, and that of the majority of the Refuge Managers, that if these directives are implemented by October 15, they will significantly degrade the System's law enforcement program. In fact, they will jeopardize the System's natural resources, endanger the visiting public, and place our remaining officers in harm's way.

For example, as the former Fish and Wildlife Regional Director for the Southeast Region, I am seriously concerned about the impacts Director's Order No. 155 will have on Refuges in the Southeast. Since 1986, the Southeast Region has voluntarily reduced by 43% the number of dual-function officers from 168 to 96 at the start of 2003. Implementing Director's Order No. 155 will further reduce dual-function officers to 23, an 86% reduction from 1986. The final result could be as many as 54 of its 126 refuges with either no full-time or dual-function officer.

During the same period, the region increased full-time officers from 11 to 52 (a 472% increase). However, despite the region's efforts to transition to more full-time officers where appropriate and possible, law enforcement challenges increased disproportionately. More refuges were added (91 to 126, a 37% increase), and acreage increased from 2.2 million acres to more than 3.7 million. In addition, approximately 431 Farmers Home Administration tracts (63,000 acres), scattered various distances away from Refuges proper, have been added. The result has been that law enforcement

coverage dropped from almost two officers per Refuge to close to just one officer per Refuge, or nearly 25,000 acres per officer! All this while the Southeast Region maintains the greatest proportion of public use of any region, including large hunting and fishing programs, and the highest number of documented violations in the Refuge System.

We feel strongly that Service Director Williams should be required to rescind Director's Order No. 155 before its impacts are felt throughout the System. The Fish and Wildlife Service should continue to move forward in developing and maintaining the professional, modern, and effective LE program you envision, but not in a manner that could leave the System's natural and public resources in jeopardy. This nation can not afford to have almost one half of its treasured national wildlife refuges without law enforcement protection in this its cherished Centennial year.

Sincerely,

Noreen Clough
President