



Public Employees for Environmental Responsibility

962 Wayne Avenue, Suite 610 • Silver Spring, MD 20910

Phone: (202) 265-PEER • **Fax:** (202) 265-4192

Email: info@peer.org • **Web:** <http://www.peer.org>

Downgrading the National Park Service Law Enforcement Training Program

February 15, 2019

This paper has been prepared in response to a proposal being advanced by the National Park Service (NPS) to abandon mandatory attendance by its permanent law enforcement rangers in the basic academy for land management law enforcement personnel (known as the Land Management Training Program, or LMTP) offered at the Federal Law Enforcement Training Center (FLETC). The agency is instead proposing to principally rely on what are at present the several “accredited” seasonal law enforcement training programs independently operated at sites and facilities throughout the country. In a closed meeting held late last June (2018), NPS managers advised the several gathered seasonal academy directors about the new NPS “basic training initiative,” whereby individuals who have attended one of the seasonal academies – to be renamed “basic training academies” – and are subsequently hired as permanent U.S. Park Rangers, would no longer be required to attend the LMTP. We question the wisdom of this proposal for reasons outlined herein.

This position paper has been prepared as a collaborative effort by a number of individuals, including former administrators of the agency’s overall law enforcement program, law enforcement training program (including oversight of the seasonal academies), and Field Training Program (FTO). Other contributors are both current and retired NPS supervisory rangers and special agents and practicing attorneys who have attended the FLETC’s Land Management Training Program, Criminal Investigator School, the FBI National Academy, as well as state and local police academies. Several of these contributors have also instructed at one

or more of the currently approved seasonal law enforcement training programs.

BACKGROUND:

In the late 1970s, a major advancement was made in the NPS law enforcement program when that agency committed itself to participation in the newly established Federal Law Enforcement Training Center located in Brunswick, Georgia.

Archival records contain the following explanation of the FLETC's origins:

*In 1968 an interagency task force completed a study on Federal law enforcement training. The study disclosed that the quality of training provided to Federal law enforcement personnel varied greatly among agencies. Differences that existed in training program content, **quality of training facilities and quality of faculty** among the agencies resulted in most training being inadequate at worst and substandard at best. With a few notable exceptions, **most training was conducted in deficient facilities, using part-time instructors, often on an intermittent or sporadic basis.** Much of the training was duplicative of, or inconsistent with, other Federal training.ⁱ*

According to the FLETC's own current website,

*Prior to 1970, the quality of training received by Federal law enforcement officers and agents varied greatly from agency to agency. **Standardized training was an unexplored concept, and inadequate facilities and duplication of effort were prevalent as each agency independently trained its own personnel.***

***Studies conducted in the late 1960's revealed an urgent need for high-quality, cost-effective training by a cadre of professional instructors using modern training facilities and standardized course content.** Congress responded by authorizing funds for planning and constructing the Consolidated Federal Law Enforcement Training Center (CFLETC). In 1970, the CFLETC was established as a bureau of the Department of the Treasury (Treasury Order #217) and began training operations in temporary facilities in Washington, D.C.*

The permanent location of the training center was originally planned for the Washington, D.C., area. However, a three-year construction delay resulted in Congress requesting that surplus Federal installations be surveyed to determine if one could serve as the permanent site. In May 1975, after an extensive review of existing facilities, the former Glynco [i.e., Glynn County] Naval Air Station near Brunswick, Georgia, was selected. In the summer of 1975, the newly renamed Federal Law Enforcement Training Center (FLETC) relocated from Washington, D.C., and began training in September of that year at Glynco. Glynco is the headquarters site and main campus for the FLETC, which has grown over the years to include facilities in Artesia, NM, Charleston, SC, and Cheltenham, MD, and Gabarone, Botswana.

On March 1, 2003, the FLETC formally transferred from the Treasury Department to the newly created Department of Homeland Security, along with some 20 other agencies. The move reflected the centrality of the FLETC's mission in support of the unified homeland security effort, which was initiated following the terrorist attacks of Sept. 11, 2001.ⁱⁱ

With the establishment of the FLETC in Brunswick, GA, the NPS signed on as a full-fledged participant in the centralized training program. The NPS assigned a senior administrator to the Center to serve as the agency representative, and implemented the requirement that all newly commissioned rangers successfully attend the new basic training program, to be augmented with agency-specific curriculum also provided at the Center. Though the basic curriculum has been significantly modified and expanded over the years, the requirement that all permanent NPS law enforcement personnel attend the FLETC has remained in place, to the benefit and betterment of the agency, for the past 43 years. This has enabled NPS rangers to rightly claim their place in the federal law enforcement community as trained professionals, subject to the same rigorous training standards (often exceeding state/local standards) as their colleagues in virtually every other federal agency. Equally important, this also allowed trainees from *other* agencies to interact with and see NPS rangers as peers and fellow law enforcement professionals, and to better understand and appreciate the comparable role that rangers play in enforcing federal laws and protecting the public in our national parks and on other federal lands.

In the interim years, the NPS has authorized and cooperated with a number of junior colleges and other institutions throughout the country to sponsor NPS-specific “seasonal law enforcement academies.” Most of these programs have been started and/or administered by retired NPS rangers who, in these second careers, have been able to retain close ties and influence with agency management. These academies were intended to produce a cadre of candidates who might be eligible work as seasonal law enforcement rangers **in support and under the close supervision of permanent staff** at the various parks. This was done in response to the Park Service’s traditional reliance on a seasonal workforce to supplement permanent law enforcement staff during peak seasons; a practice discouraged by the Department of the Interior. Nevertheless, because of their temporary status, seasonal employees were not eligible to attend the FLETC’s basic training program. The seasonal academies have, to varying degrees, satisfied the need to provide stipulated training to prospective seasonal employees. Establishment of the seasonal academies has also allowed the NPS to avoid paying for basic law enforcement training that is nevertheless mandated for those seasonal rangers. Candidates pay their own way through these programs as private citizens, on their own time. Another advantage for the NPS is that liability for injuries and other damages suffered during training is generally borne by either the student or those institutions, and not the federal government (see Legal/Liability Concerns, below, for exceptions). NPS now intends to utilize these facilities and programs in place of the FLETC.

Historically, several of these programs have come and gone, as they have struggled to meet standards required of even “seasonal academy” status, to attract students, to maintain financially viable programs, or balance the conflicting demands created by their status as state or local (as opposed to federal) institutions. In just the past few years, the following institutions have dropped out of participation in the NPS seasonal law enforcement training program: Hocking College (Jan. 2014), San Antonio College (July of 2014), Slippery Rock University (June 2014), Unity College (Maine) (July 2014), Univ. of Mass. – Amherst (July 2013). Currently, seven programs remain. It is unclear how and under what authority the NPS would either authorize or reject any other programs at other institutions that might wish to participate (see Legal/Liability Concerns, below).

If the current plan is implemented, the NPS will be abandoning its commitment to the founding objective linked to the creation of the FLETC; i.e., “***an urgent need for high-quality, cost-effective training by a cadre of professional instructors using modern training facilities and standardized course content.***” In many respects, it will be reverting to the approach where training is “***conducted in deficient facilities, using part-time instructors, often on an intermittent or sporadic basis.***” It will also be acting against Congress, which intended to provide consistent law enforcement training for federal agencies when it authorized creation of the FLETC.

ISSUES/CONCERNS

LEGAL/LIABILITY CONCERNS:

We believe this proposal, if implemented, will needlessly expose the NPS and the FLETC to liability, and will expose both employees and the public to increased risk by utilizing rangers in their law enforcement capacity who have received sub-standard training. We believe the “authorization” of this proposed policy is based upon inadequate review and assessment by both the NPS and the FLETC.

Not only do issues of *government* liability derive from questions about the quality and consistency of instruction that is provided at these seasonal academies. Employees whose commissions (i.e., delegation of law enforcement authorities) are based upon training received at these facilities may also face increased personal liability. Currently, NPS rangers and other federal officers who face civil or criminal actions arising from the performance of their official duties have access to federal government attorneys and agents, available to testify as to the content and quality of the training they received at the FLETC. Can the same be said in those instances where a ranger has received his or her training through a seasonal academy that is owned and operated by a local community college? Who will bear the cost of such testimony? Who will bear liability where the issues of quality and content of training provided to the defendant is called into question? Given the transient nature of their instructors and the high turnover of management over these programs, would institutions operating these seasonal academies be able to provide

witnesses offering credible testimony as to the quality and content of instruction that was provided?

The DOI/NPS solicitor has previously raised concerns about potential conflicts of interest and liability issues that may exist for the NPS in its relationship(s) with the various seasonal academies. These concerns derive from practices where the NPS selectively (and non-competitively) subsidizes various seasonal academies by loaning government equipment (including firearms), providing lesson plans, and even allowing current NPS rangers to serve as guest instructors. Since the federal government has then technically provided the training, it could be held liable for questionable activities and instruction provided at what are otherwise autonomous state or local institutions. Of additional concern is the conflict of interest created when currently employed rangers whose own training and certification has been provided and paid for by the government, simultaneously serve as paid instructors for these independently run de-facto for-profit academies. These concerns were relayed to the seasonal academy directors during a conference call this past Fall.ⁱⁱⁱ

If implemented, the NPS may violate the provisions of DOI Departmental Manual (DM)-446, chapter 2.4, regarding agency training, which specifies that “all entry level law enforcement personnel and criminal investigators shall successfully complete the prescribed training courses at the Dept. of Homeland Security FLETC. Approval of the Director, Office of Managing Risk and Public Safety is required for training programs not conducted by the DHS-FLETC. We question if the NPS has been forthright in submitting its request for such authorization, and whether the Director has been briefed on many of the issues addressed in this paper.

VIOLATION OF PROCEDURES:

We believe that a violation of procedures established by the FLETC for accreditation may have occurred, by performing only “random samplings” of one or two programs, and then extending accreditation to all the rest. We have information indicating that some of the institutions have actually used deceptive practices to receive or maintain their accreditation, employing unapproved online computer-based learning in place of required classroom hours, and reviewing actual test questions with students before tests are administered. While the NPS has been aware of these practices for some

time, the agency has repeatedly failed to enforce standards for accreditation in response to political pressure.

We also have reason to believe that last Spring, in an effort to win the support of the Federal Law Enforcement Officers Association (FLEOA), the NPS agency representative at the FLETC misrepresented the Park Service's intentions about the NPS training proposal. In an email dated June 4, 2018, the NPS-FLEOA representative stated that both the NPS agency representative at the FLETC and the NPS Chief of Law Enforcement and Security had told him that "*there is NO plan to remove the Basic Law Enforcement Training Program (Level I) at the FLETC for prospective permanent law enforcement officers or for Seasonal Training (Level II) commissioned officers, wishing to work as an NPS officer and waiting for a career training opportunity to be hired permanently and obtain their permanent Level I commission*" [emphasis in original].^{iv} This directly contradicts information provided later that month to the various seasonal academy directors (Page 1, *supra*, opening paragraph).

NON-EQUIVALENCE OF TRAINING:

The NPS has attempted to justify its proposal by citing the fact that the seasonal academies are currently accredited by the Federal Law Enforcement Training Association (FLETA). However, accreditation in its current form is a mere paperwork exercise. As one former NPS seasonal academy coordinator has acknowledged, **accreditation addresses standardization of curriculum, but does not assure equivalency of training**. It does not track instructor capabilities, nor does it address the actual learning experience that is provided to students. When the FLETA started accrediting seasonal academies several years ago, they would only review one of the 8 academies. This meant that the other 7 academies were automatically granted accreditation with no on-site review of their accreditation paperwork or facilities. Using these criteria, it would take 12 years for all sites to be visited. This is assuming NPS FLETC holds true to the accreditation process with the remaining seasonal academies. Further, accreditation managers at FLETC with LE experience are GS 12 or 13. The current NPS accreditation manager is a former GS-7, with no LE experience.

- The facilities at the FLETC and its satellite campuses are the best in the nation. There is no comparison between the FLETC facilities to those at seasonal academies. The FLETC driving range is a \$3.2 million facility, with a four-wheel driving course. The crime scene investigation facility is a 30,000 square foot indoor facility, which can be used in all weather conditions with various scenarios. There are three commercial airline fuselages where basic students learn the concepts of flying while armed. The FLETC-Glynco has a multi-million dollar “Hogan’s Alley” and simulation town, using professional role-players, with total video coverage used to review and critique student performance through a wide variety of training scenarios.^v None of the institutions currently serving as seasonal academies have facilities that even come close to this, depriving students of the critical opportunity to test and develop their skills in life-like – but controlled – training environments.
- The FLETC conducts mandatory curriculum reviews for all of its instructional blocks. During these reviews, lesson plans are updated to reflect current case law and new techniques. How will the NPS assure that seasonal academies maintain and utilize updated lesson plans?
- To be a FLETC instructor, one must first complete the mandatory 80-hour Law Enforcement Training for Instructors. After completion, new instructors are assigned to a senior instructor. Depending on the complexity of the instruction, they will shadow the senior instructor no less than a month or in some cases several months. In the Physical Techniques and Driver/Marine Divisions, it takes several months before they are allowed to team teach under the supervision of the senior instructor. **Few if any instructors at the various seasonal academies have gone through this process.** In fact, many instructors are recruited “ad hoc,” as the facilities cycle through a succession of instructors recruited from the ranks of local agencies, DA’s offices, and local parks.
- From facility-to-facility and session-to-session, there is little if any continuity in the quality of instruction provided at seasonal academies. Instructors are frequently recruited – often hastily – from nearby law enforcement agencies as well as local district attorney’s or other prosecutor’s offices. These instructors are frequently

unfamiliar with the details of federal and agency policy, or with the intricacies of federal law, leading to the introduction of materials into lessons that does not satisfy or comply with federal law or policy.

- So, for example, should basic trainees be instructed by a seasonal academy firearms instructor, who instructs the FLETC lesson plan once a year or the FLETC firearms instructor who teaches daily?
- According to FLETA's own website, "accreditation is a cyclical process occurring every five years," at which time "agencies must submit annual reports in preparation for reaccreditation..."^{vi} However, few if any instructors – not to mention program directors – at any of the seasonal academies have achieved a tenure of more than few years.
- There is no mechanism for seasonal academy instructors to regularly attend FLETC instructor updates on firearms, driving, or any other instructional components.
- As a cost-saving measure, instruction at the seasonal academies is compressed into 12 weeks. For example, firearms training is compressed into 10-day windows to include weekends, whereas FLETC firearms training is spread out over the entire 16 weeks of the current academy. Similar compromises are made in other curriculum areas. The FLETC model allows for more time for students to study, prepare, and recover from training, resulting in better understanding and retention of the subject matter, and more opportunity to develop critical skills.
- At Temple University, trainees have been forced to use their personal vehicles for traffic stops. Other facilities have actually resorted to simulating traffic stops through the use of chairs positioned inside the classroom. Few if any of the seasonal academies practice the Pursuit Intervention Technique maneuver on their driving ranges.
- We are aware of one current firearms instructor, retired from a state agency, who included training for NPS students in the use of military-style "suppression fire" as a legitimate tactic in armed encounters.

By claiming that the training received at these contract facilities is equivalent to that provided at the FLETC, the NPS has been able to justify the abandonment of two different categories of law enforcement commissions, i.e., a Level I "full" commission, vs. a Level II "seasonal"

commission. While there is no difference in the actual authorities conveyed by these different categories of commissions, they are distinguished by the types of duties and assignments which, by policy, the holder may undertake, and the term or duration of their delegated authority before renewal. By awarding “full” commission status to those students, the NPS seems to be headed in the direction of using a rotating cadre of seasonal rangers in place of what should be more experienced and better trained permanent personnel, and eliminating the requirement to utilize seasonal rangers in only support capacities, under the immediate supervision of permanent personnel.

In response to criticisms that have already been raised, the NPS has proposed a three-week “add-on” for an advanced basic class at the FLETC in Georgia that would be attended by graduates of the seasonal academies. To our knowledge, there have been no needs assessments or level three surveys of either entry level and supervisors or curriculum development for this three-week add on. We also question whether such an “add-on” session would remedy the deficiencies that exist in training provided at the current seasonal academies.

NON-COMPATIBILITY WITH FIELD TRAINING PROGRAM:

- The International Association of Police Chiefs (IACP) in their last three reviews of the NPS law enforcement program repeatedly recommended that the NPS implement a field training officer program (FTO).
- In 2003, the NPS did implement its first ever service-wide FTO program. The Park Service has extremely diverse law enforcement programs, reflecting wide variances in types and levels of criminal activity experienced at the different parks. Consequently, rangers assigned to one park may write only a handful of tickets a year and seldom if ever make an arrest, whereas rangers assigned to another park or recreation area may make several felony arrests a week and become engaged in high-speed vehicle pursuits and violent confrontations on a regular basis. To properly train and prepare NPS rangers, their entire time and performance in the academy needs to be carefully monitored and evaluated. The Land Management Training Program (LMTP) training cycle is currently 16 weeks in

length. Thereafter, students are assigned to one or more field training parks for further training and probationary evaluation. Prior to placing these trainees at the FTO sites, FLETC/NPS instructors review the student's academic and skills performance, making an assessment of which FTO site would best serve to address and evaluate areas in need of further development.

- This process does not – and cannot – happen with the seasonal academy model, and is not possible with a three-week add-on. To our knowledge, there is no requirement for the seasonal academies to provide feedback of this kind to NPS-FLETC on academic or skills development. Consequently, under the NPS proposal, the field training program becomes a check-off sheet.

IMPACT ON OTHER LAND MANGEMENT AGENCIES:

- The majority of trainees who currently attend the FLETC Land Management Training Program are sent from the NPS and U.S. Forest Service (USFS). With the NPS going to seasonal academies, the opportunities for the USFS, the Bureau of Land Management (BLM), and the U.S. Fish and Wildlife Service (USF&WS) will decrease from 8 FLETC LMTP academies to two or three a year.
- As previously noted, under the NPS proposal, its rangers will be the only federal law enforcement agency to receive their basic training at community colleges. The career opportunities for NPS personnel will be limited, since the USFS, USFWS, and BLM will not accept NPS rangers for transfers. Their agency directives require basic training at the FLETC.

ADDITIONAL IMPACTS AND CONCERNS:

- If the NPS adopts this training model, commissioned NPS rangers will not only receive subpar training but most will also have to pay for their own basic training. Seasonal academy tuitions range from four to seven thousand dollars. This will directly impact diversity within the NPS law enforcement program.
- Many underrepresented groups and those with minimal financial resources cannot afford such a training expense. Implementation of the NPS proposal will have negative impacts on the diversity of the NPS workforce.

- At the seasonal academies the trainee is a customer; since they are paying for the instruction. Does a seasonal academy fail a paying customer?
- What contingency plans are in place in the event that one or more of these academies withdraws from the program, or they collectively resist the standards required for accreditation. Does the NPS relax training standards to accommodate the academies, as has already occurred with some of the more powerful institutions (see Violation of Procedures, above)? How would the agency respond to a Congressionally authorized surge in hiring, with an immediate need to train more rangers? By relying on these programs for its training, the NPS is at the mercy of the seasonal academies.

Contrary to popular notions, crime has long been a serious issue affecting national parks, and U.S. Park Rangers have a long a proud history of combatting that crime in these protected areas.^{vii} The American Federation of Government Employees has acknowledged that U.S. Park Rangers have one of the most dangerous jobs in government.^{viii} Studies indicate that rangers are among the most assaulted employees in the federal workforce. In 2018 alone, NPS rangers responding to deadly assaults were involved in two separate officer-involved shooting incidents, one resulting in a fatality.

In January of 2002, the DOI Office of the Inspector General, issued a report documenting an extensive investigation and review of the DOI law enforcement programs. That report, titled “A Disquieting State of Disorder – an assessment of Department of the Interior Law Enforcement,” identified the decentralized and inconsistent nature of NPS law enforcement as a key factor contributing to that “disorder.”^{ix}

Anti-law enforcement factions within NPS management have long tried to resist the statutory mandate for the agency to satisfy law enforcement training standards established and imposed upon it by the Department of the Interior. When the FLETC was first established in the mid-1970s, some superintendents advocated that the NPS withdraw from participation and instead provide its own minimal training. One powerful superintendent declared, “The 400-hour police training [then prescribed as the minimal standard] should be dropped ... Rangers should have less extensive basic training which includes lots of emphasis on how *not* to write a ticket ...

Perhaps 80 hours of training and no weapons would be OK.”^x Another superintendent (and future NPS director) declared, “We cannot continue sending ‘our rangers’ to ‘their school’ [i.e., the FLETC] and expect them to return with the proper attitude. I would suggest that we immediately look for a way to train ‘in house.’”^{xi} Now, if successful in implementing its proposal, the Park Service will be taking a big step *backward* toward the fulfillment of those ill-conceived desires. Leaving the NPS as the only federal land management agency not using the FLETC for its basic law enforcement training. In the process, the agency will be abandoning a principle objective in the establishment of the FLETC and rendering NPS attendees ineligible for transfer to other agencies. Another negative consequence of such a move would be the overall reduced demand for the FLETC Land Management Training Program, creating reduced opportunities for personnel from other agencies such as the USFS, USF&WS, and BLM to schedule training, and all but assuring an administrative and scheduling nightmare when the deficiencies in the NPS “initiative” are realized and the agency attempts to re-insert itself as a full-time participant in the FLETC training program.

In recent years, federal law enforcement – and particularly federal land management law enforcement – has come under increasing criticism from communities impacted by federal actions. As recently as 2017, legislation was introduced in Congress to withdraw law enforcement authority from the USFS and the BLM, and instead charge local authorities with the enforcement of relevant federal laws.^{xii} While that effort was unsuccessful, it highlights the degree to which federal agencies are under scrutiny and being challenged not only for their basic federal mission which is ideologically opposed by many, but also for their activities and the level of professionalism their officials may or may not exhibit in the field.

To avoid such a fate, the NPS should certainly *not* be pursuing an effort to reduce the quality and consistency of training provided to its law enforcement rangers. To the contrary, the NPS should be engaged in an effort to strengthen its law enforcement program by imposing more stringent and more comprehensive training standards, and insisting on greater continuity and consistency in its training by requiring that all of its permanent rangers participate in the basic training program (LMTP) at the FLETC. Curriculum should be expanded – not compressed – from the

current 16 weeks, to include even more emphasis and more time on both criminal as well as civil law and related case law, better development of sound field tactics through more training scenarios with role-players, increased development of verbal skills, diffusion and de-escalation tactics, and the strengthening of its field training program to assure that only those rangers who exhibit the highest levels of performance and judgement are delegated with authority to serve as commissioned U.S. Park Rangers.

Meanwhile, if the NPS is to continue to use seasonal employees as commissioned U.S. Park Rangers, the number of existing seasonal academies authorized to provide training to qualify for a Level II law enforcement commission should be reduced from the current seven to a more manageable few; no more than three or four, evenly dispersed geographically across the country with their schedules staggered throughout the year so that that officials from the FLETC can be situated on-site to more closely monitor training that is provided to students and to better assure continuous compliance with mandated course curriculum and other accreditation standards.

ⁱ <https://fas.org/irp/agency/ustreas/fletc/history.htm>

ⁱⁱ <https://www.fletc.gov/fletc-history>

ⁱⁱⁱ See United States Department of the Interior, Office of the Solicitor, Memorandum of July 31, 2018, Director, Departmental Ethics Office and Designated Agency Ethics Official, to Deputy Ethics Counselor, National Park Service, re: "Updated Seasonal Law Enforcement Training Program Guidance." Also, NPS Memorandum of Nov. 27, 2018, Chief, Law Enforcement, Security and Emergency Services, to Superintendent, NPS Law Enforcement Training Center, re: "Use of NPS Employees at Seasonal Law Enforcement Training Academies."

^{iv} R. Still to JR Tomasovic, June 4, 2018, re: Contact Us at FLEOA

^v <https://www.news4jax.com/news/inside-look-at-virtual-city-built-to-train-our-protectors>

^{vi} "FLETA Reaccredits NPS Program." <https://www.fleta.gov/press-release/2016/04/11/fleta-reaccredits-nps-program>

^{vii} Paul D. Berkowitz, *U.S. Rangers – The Law of the Land: The History of Law Enforcement in the Federal Land Management Agencies* (Redding, CA: C.A.T. Publishing, 1995).

^{viii} https://www.afge.org/article/top-10-most-dangerous-jobs-in-the-federal-government/?link_id=7&can_id=8b4fece4bb258f0011a1711732f656d8&source=email-do-you-know-the-10-most-dangerous-government-jobs&email_referrer=email_450236&email_subject=do-you-know-the-10-most-dangerous-government-jobs&fbclid=IwAR2M6UGrX7BnmFdmzSGNZ5TcyYle-iCd2m-UdTejr9pAy6i_1Qr8WNcC9HY#.W-HnKobKC8k.facebook

^{ix} <https://www.govinfo.gov/content/pkg/GPO-DOI-IGREPORTS-2002-i-0014/pdf/GPO-DOI-IGREPORTS-2002-i-0014.pdf>

^x Daniel J. Tobin, Jr. (Superintendent, Mount Rainier National Park) to Howard M. Chapman, Chairman, Law Enforcement Task Force, "Law Enforcement in the National Park Service," Sep. 3, 1976. Also, Paul D. Berkowitz, *Legacy of the Yosemite Mafia: The Ranger Image and Noble Cause Corruption in the National Park Service* (Walterville, OR: Trine Day Publishing, 2017) 93-94.

^{xi} William J. Whalen, General Manager, Bay Area National Parks, to Howard Chapman, Regional Director, Western Region, "Ranger Image," Sep. 3, 1976. Also, Paul D. Berkowitz, *Legacy of the Yosemite Mafia: The Ranger Image and Noble Cause Corruption in the National Park Service* (Walterville, OR: Trine Day Publishing, 2017) 93-94.

^{xii} <https://www.congress.gov/bill/115th-congress/house-bill/622>