



## Fraternal Order of Police United States Park Police Labor Committee

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### Memorandum

To: United States Department of the Interior Law Enforcement Task Force

From: Kenneth Spencer, Chairman (USPPFOP)

Date: August 2, 2022

Re: Creating Safe and Effective U. S. Department of the Interior Law Enforcement Operations

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We are grateful for this opportunity to submit comments to the DOI Law Enforcement Task Force. The Fraternal Order of Police United States Park Police Labor Committee (USPPFOP) is recognized by the Federal Labor Relations Authority as the official representative of United States Park Police (USPP) Officers and Detectives. The USPP has been dangerously understaffed and poorly equipped for over three decades. During this period, the USPPFOP has continually provided evidence of these problems and made numerous attempts to get the National Park Service (NPS) to fix the USPP's operational deficiencies. The National Park Service (NPS) has failed to fix these problems. The USPPFOP's concerns have been ignored. Disturbingly, over the years, the issues have only grown worse.

Many Federal Police Agencies have grown significantly since 9/11. For instance, the United States Capitol Police (USCP) has expanded considerably since 9/11, and there are plans to add additional officers in FY 2023. Sadly, the USPP currently has fewer people than it did in 1975. The NPS has failed to respond to significant increases in population, visitation, traffic volume, additional attractions, and threats in its areas of operation since 1975. The NPS not only failed to hire more USPP officers over the last two decades in response to evidence justifying additional officers, the NPS has allowed the USPP officer cadre to shrink.

Sadly, the NPS has not articulated a clear plan to remedy the USPP's dangerous operational readiness issues. The NPS not having a plan isn't surprising, as how can the NPS fix the USPP's staffing problems when they continually refuse to officially declare how many officers the USPP needs to operate safely and effectively? While agencies like the USCP and the U. S. Secret Service Uniformed Division (USSS-UD) routinely discuss how many officers they need during the budgeting process, the NPS refuses to declare any officer staffing need. It is troubling to contemplate that they either don't know how many USPP Officers they need or feel that declaring it will force them to reexamine their budget priorities. The result of this atmosphere is that the NPS has recklessly neglected its law enforcement mission for decades. Their ignore law enforcement attitude needs to be changed as it makes no sense to spend millions fixing things and then fail to take adequate measures to

protect them. The USPPFOP has concluded that during the last few years USPP Officers have been needlessly injured because of the NPS's failure to properly staff the USPP, give it the resources to obtain needed equipment, and to provide the time required for professional training.

Critical incidents that have occurred throughout the United States over the last few years have clearly established that the safety of the public and officers is put in extreme risk when responses are severely understaffed, badly led, lack proper equipment, or are staffed by improperly trained officers. During critical incidents lives can be saved by having a response force able to swiftly arrive, swiftly make an area safe and immediately transition to treating casualties. To do this a force needs:

1. Resources to provide proper training (Facilities and Equipment)
2. Time to receive training and practice (maintain) needed skills
3. Resources to obtain the tactical equipment needed for responding to critical incidents
4. Medical equipment and resources needed to provide immediate treatment of victims of mass casualty incidents. This equipment must be with the first responders – ***Immediately Available***. Find out more here: <https://www.stopthebleed.org/media/xt0hjwmw/hartford-consensus-compendium.pdf>

***Note: You can view the evidence supporting our assertions at this location: ([Link to Evidence](https://padlet.com/usppfop/smyl8ouskidubyov)) - <https://padlet.com/usppfop/smyl8ouskidubyov>***

The USPP doesn't have the resources needed to effectively respond to critical incidents. The current unsafe working conditions plaguing USPP Officers have made it impossible for them to perform their mission safely and effectively. Here are our recommendations to fix these issues:

- Compel the NPS to secure a truly independent staffing study to establish a USPP Officer staffing number. This number must allow for safe and effective daily operations, special events, and critical incidents. All stakeholders must be allowed to participate in the process. This staffing number must consider providing enough staffing for the USPP to respond safely, swiftly, and effectively in incidents like:
  - An active shooter or shooters in the Lincoln Memorial, the Jefferson Memorial, or on the National Mall,
  - An individual using a vehicle as a weapon to kill and maim visitors on a crowded National Mall or Crissy Field
  - An unruly mob spray painting graffiti and assaulting visitors at the World War II Memorial or the Martin Luther King, Jr. Memorial
  - A terrorist attack at the the Statue of Liberty
  - Rioters at a spontaneous demonstration (No Permit Issued) in Lafayette Park destroying public property, committing arson, and attempting to breach White House security;
  - A bombing at any of these locations;
- Compel the NPS to declare, as part of the yearly budget process, how many officers the USPP requires to perform their mission safely and effectively;
- Compel the NPS to staff the USPP according to that number;

- Immediately increase USPP officer staffing to at least 1000 - as any truly independent staffing study would conclude that at least this numbers of USPP Officers were needed - by adding four recruit classes a year until that staffing level is achieved;
- Improve Training- Provide each officer time weekly- equal to 20% of their workweek- to participate in training designed to maintain and improve the mental and physical skills critical to performing their duties;
- Provide the USPP with a budget per sworn officer position at least equal to that of the United States Capitol Police;
- Implement the "REMEDIES SOUGHT" specified in USPPFOP Grievance: 2022-4-7, submitted to USPP management on April 7, 2022
- Conduct a yearly conference of Management, Labor, and all other interested parties to discuss and prepare a report on the state of law enforcement in the Department of the Interior. Allow all parties to submit testimony. This report should be officially presented to the DOI Secretary.

Regards,



Kenneth Spencer  
Chairman