

GAO

Report to Congressional Requesters



LM129431

March 1986

NATIONAL PARKS

Law Enforcement Capability and Cost Comparisons at Two Recreation Areas



RELEASED

RESTRICTED—Not to be released outside the General Accounting Office except on the basis of specific approval by the Office of Congressional Relations.



United States
General Accounting Office
Washington, D.C. 20548

Resources, Community, and
Economic Development Division

B-218958

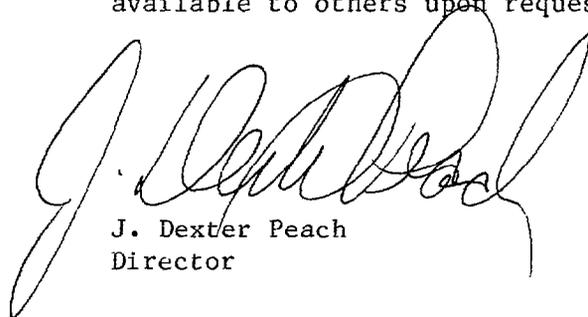
March 7, 1986

The Honorable James A. McClure
Chairman, Subcommittee on Interior
and Related Agencies
Committee on Appropriations
United States Senate

The Honorable Sidney R. Yates
Chairman, Subcommittee on Interior
and Related Agencies
Committee on Appropriations
U.S. House of Representatives

As requested in your October 2, 1984, letter and subsequent agreements with your offices, this report addresses the principal issues of a hypothetical replacement of U.S. Park Police with commissioned Park Rangers at Gateway and Golden Gate National Recreation Areas. The report discusses the ability of commissioned Park Rangers to adequately provide visitor and resource protection and comparative personnel compensation, benefits, and pension costs of Park Police and commissioned Park Rangers at the two recreation areas.

As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 10 days from its issue date. At that time we will send copies of the report to the Director, Office of Management and Budget; the Secretary of the Interior; and other interested parties. We will also make copies available to others upon request.



J. Dexter Peach
Director

Executive Summary

Gateway and Golden Gate National Recreation Areas, created in 1972, provide the urban populations of New York City and San Francisco with a multitude of recreational opportunities. The Senate Committee on Appropriations has questioned the use of U.S. Park Police to carry out law enforcement activities at the two parks because (1) national Park Rangers carry out similar law enforcement activities at other national parks and (2) Park Police personnel costs are higher than those of Park Rangers.

Because of these concerns at Gateway and Golden Gate, the Chairmen of the Subcommittees on the Interior and Related Agencies, Senate and House Committees on Appropriations, asked GAO to report on the

- ability of Park Rangers to adequately provide visitor and resource protection (law enforcement services) and
- comparative personnel compensation, benefits, and pension costs of Park Police and Park Rangers.

Background

The National Park Service is responsible for maintaining law and order and protecting persons and property within the national park system. These services are provided by the Park Service's two law enforcement organizations, the U.S. Park Police and the Park Rangers. The Park Police is an urban-oriented police force that was created to provide law enforcement services to the national park areas and monuments in Washington, D.C., and the surrounding area. Park Rangers were to be responsible for visitor and resource protection at all other areas of the national park system.

The creation of Gateway and Golden Gate in urban areas heightened Park Service concerns for the safety and protection of park visitors and resources. Since Park Rangers had no formalized law enforcement training at that time, the Park Service permanently assigned the visitor and resource protection duties at both gateways to the Park Police in 1974. In 1977, however, the Park Service established a voluntary "commissioning" program that provided Park Rangers with law enforcement training. Currently, 84 Park Police and 34 Park Rangers perform law enforcement activities at both gateways.

Results in Brief

Commissioned Park Rangers can perform the law enforcement function now handled by Park Police at Gateway and Golden Gate. In addition,

by replacing Park Police with commissioned Park Rangers and eliminating Park Police positions, long-term personnel and pension cost savings are possible, even though such action would increase short-term costs. According to the Park Service, however, such action raises concerns that need to be considered before deciding whether to use Park Police or Park Rangers at Gateway and Golden Gate.

Principal Findings

Visitor and Resource Protection

Park Service, Park Police, state and local police, military police, and other officials believe that commissioned Park Rangers are capable of providing visitor and resource protection at Gateway and Golden Gate, on the basis of their law enforcement training and performance.

Park Police and commissioned permanent Park Rangers receive training in similar areas such as detention and arrest procedures, use of firearms, legal procedures, and self-defense. Park Police training in these areas is more extensive than that given Park Rangers (680 hours vs. 360 hours).

Park Police and commissioned Park Rangers also have to handle similar law enforcement offenses such as homicide, rape, robbery, and assault.

Park Service officials pointed out, however, that several factors need to be addressed before the Park Police can be replaced by commissioned Park Rangers. They include further assessment of Park Rangers' off-federal-parkland law enforcement status, the public's recognition of Park Rangers' law enforcement authority, and potential recruitment and retention problems.

Cost Comparison

In 1984 law enforcement costs were about \$2.3 million at Gateway and \$1.7 million at Golden Gate for 84 Park Police and 34 commissioned Park Rangers, respectively. If the 84 Park Police had been replaced by 91 commissioned Park Rangers (minimum resource requirements identified by the two park superintendents), personnel compensation and benefits costs at the two parks may have been reduced in 1984 by \$740,338. However, the Park Service might have incurred a one-time cost of as much as \$2.94 million in relocation expenses and \$199,381 in law enforcement training expenses to commission 91 Park Rangers.

The Park Service would have realized personnel cost savings in 1984 and in subsequent years if, in addition to replacing Park Police with Park Rangers at Gateway and Golden Gate, 30 Park Police positions were subsequently eliminated from the Park Service; the result of a major assumption used for GAO's cost comparison. Under this approach the Park Service would have saved (1) \$802,314 in annual recurring personnel compensation and benefits costs and (2) \$3.2 million in pension cost savings, with an additional \$40,000 to \$1.2 million in annually recurring pension savings, depending on the grade levels; time in service; and termination dates of the 30 Park Police. If the 30 Park Police positions were terminated, the Park Service might have incurred \$199,381 in training expenses, but relocation expenses might have decreased from \$2.94 million to \$2.44 million. In addition, severance and unemployment compensation pay for the 30 Park Police might have cost as much as about \$69,000 and \$161,000, respectively, according to Park Service officials.

Recommendation

To assist the Congress in deciding which police force should be used at Gateway and Golden Gate, GAO recommends that the Secretary of the Interior assess recruitment and retention problems and the difficulty in obtaining off-federal-parkland law enforcement authority for commissioned Park Rangers at these areas. In addition to the enforcement capabilities and cost information discussed in this report, the results of the assessment should provide the Congress with adequate information on the consequences of shifting the work force from Park Police to commissioned Park Rangers.

Agency Comments

The Department of the Interior agreed with the report's recommendation stating that the additional information gained through the assessment would be beneficial but disagreed with several report statements and ensuing conclusions. Interior's disagreements generally relate to commissioned Park Rangers' law enforcement qualifications and police authority needed to adequately provide law enforcement services at Gateway and Golden Gate.

GAO recognizes the concerns raised by the Department and is calling for an assessment by Interior to quantify the extent of the problems associated with using a commissioned Park Ranger force at Gateway and Golden Gate.

Contents

Executive Summary		2
<hr/>		
Chapter 1		10
Introduction	Gateway and Golden Gate Offer Recreational Opportunities to Urban Residents	11
	Law Enforcement Role of the Park Service	13
	Park Police Presence at Gateway and Golden Gate Has Generated Congressional Concern	15
	Objectives, Scope, and Methodology	15
<hr/>		
Chapter 2		20
Ability of Park Rangers to Provide Visitor Protection and Enjoyment at Gateway and Golden Gate	Law Enforcement Authority of the Park Service	20
	Park Ranger Law Enforcement and Natural Resources Skills	23
	Comparison of Park Police and Park Ranger Training	25
	Comparison of Park Police and Park Ranger Performance	29
	Other Factors That May Affect Performance	36
<hr/>		
Chapter 3		42
Comparison of Park Rangers and Park Police Law Enforcement Costs	Personnel Compensation, Benefits, and Pension Contribution Costs	42
	Actual Law Enforcement Costs at Gateway and Golden Gate	43
	Estimated Law Enforcement Costs at Gateway and Golden Gate If Commissioned Park Rangers Had Replaced Park Police	44
	Law Enforcement Replacement Cost Comparison	46
	Savings Would Occur From Eliminating 30 Park Police Positions	47
<hr/>		
Chapter 4		50
Conclusions, Recommendation, and Agency Comments	Recommendation	51
	Agency Comments	51

Appendixes

Appendix I: Advance Comments From the Department of the Interior	52
Appendix II: Description of Gateway and Golden Gate National Recreation Areas	70
Appendix III: Locations Visited/Contacted	78
Appendix IV: Pension Costs for Park Police and Park Rangers	80

Tables

Table 1.1: Park Police and Commissioned Park Rangers Assigned to Gateway and Golden Gate as of September 30, 1984	15
Table 2.1: Required Training for Park Police and Commissioned Park Rangers	26
Table 2.2: Type I Reported Offenses During 1984	32
Table 2.3: Visitations and Offenses Recorded by Park Rangers at Nine Selected National Parks During 1984	33
Table 2.4: Fiscal Year 1984 Salary Range of Park Police and Park Rangers	39
Table 3.1: Actual Law Enforcement Personnel Costs for Fiscal Year 1984	44
Table 3.2: Estimated Law Enforcement Personnel Costs for Fiscal Year 1984	45
Table 3.3: Comparison of Actual and Estimated Law Enforcement Costs at Gateway and Golden Gate for Fiscal Year 1984	46
Table 3.4: Estimated Personnel Cost Savings if 30 Park Police Positions Were Eliminated for Fiscal Year 1984	47
Table I.1: Components of Park Police Termination Cost Estimate	68
Table IV.1: Change in Cash Flows	83
Table IV.2: Net Pension Savings if 30 Park Police Are Terminated	84
Table IV.3: Minimum Savings Scenario	84
Table IV.4: Maximum Savings Scenario	85

Figures

Figure 1.1 Gateway National Recreation Area	12
Figure 1.2 Golden Gate National Recreation Area	13
Figure 2.1: Riis Beach at Breezy Point Unit of Gateway National Recreation Area	30
Figure 2.2: Golden Gate National Recreation Area Beach in Marin County	31

Figure 2.3: The Park Police Officer (Left) and
Commissioned Park Ranger (Right) Shown in
Summer Uniform

38

Abbreviations

CRS	Congressional Research Service
CSRS	Civil Service Retirement System
FAA	Federal Aviation Administration
FICA	Federal Insurance Contributions Act
FLETC	Federal Law Enforcement Training Center
GAO	General Accounting Office
NYPD	New York City Police Department

Introduction

The National Park Service of the Department of the Interior was created in 1916 to administer a system of national parks. An unwritten federal policy prohibited using federal funds to purchase national parklands. Therefore, new parks were created out of public lands already in government ownership or lands donated to the government. Consequently, national parks became concentrated in the mountain states and far West, where the government held vast amounts of land. The distances between these national parks and the nation's urban centers limited urban residents' access to national parks.

By the mid-1960's, private and public interest groups advocated the importance of serving the recreational needs of millions of inner-city residents by creating national parks in or near the nation's urban areas. As a result of years of effort by local governments, citizens groups, the National Park Service, and members of Congress, the first urban parks—Gateway, New York, and Golden Gate, California, National Recreation Areas—were established in 1972.¹ Since then, the Congress has established four other urban parks, including Cuyahoga Valley National Recreation Area, Peninsula, Ohio (1975); Chattahoochee River National Recreation Area, Marietta, Georgia (1978); Jean Lafitte National Historical Park and Preserve, New Orleans, Louisiana (1978); and Santa Monica Mountains National Recreation Area, Woodland Hills, California (1978).

In 1977 the Park Service noted that the proximity of Golden Gate parklands to large numbers of people was truly unique. The House Interior Committee's report on Public Law 92-592 referred to Gateway as a "major breakthrough in recreation planning" and stated that it would be the "... first federal recreation area in the heart of an urban complex and it will bring the national park program closer to the people than ever before." The Senate Interior Committee's report on Public Law 92-592 stated that Gateway's parklands offered a number of natural areas of outstanding quality "... still available adjacent to the most heavily populated urban center in the entire country." However, because of both parks' urban locations, the Park Service was concerned that visitor victimization and loss or destruction of government property would be more severe and frequent at the two new parks than that previously experienced at its more remote park locations.

¹Public Law 92-592, 86 Stat. 1308 established Gateway and Public Law 92-589, 86 Stat. 1299 established Golden Gate.

Because of the Park Service's concerns, a contingent of 45 and 29 United States Park Police were permanently assigned to Gateway and Golden Gate in 1974, respectively, in addition to the Park Rangers that were assigned to the two parks in 1972. Although the Park Police are routinely detailed on temporary assignments from the National Capital Region (Washington, D.C.) to various Park Service field locations, their permanent presence at Gateway and Golden Gate was unique within the National Park System.

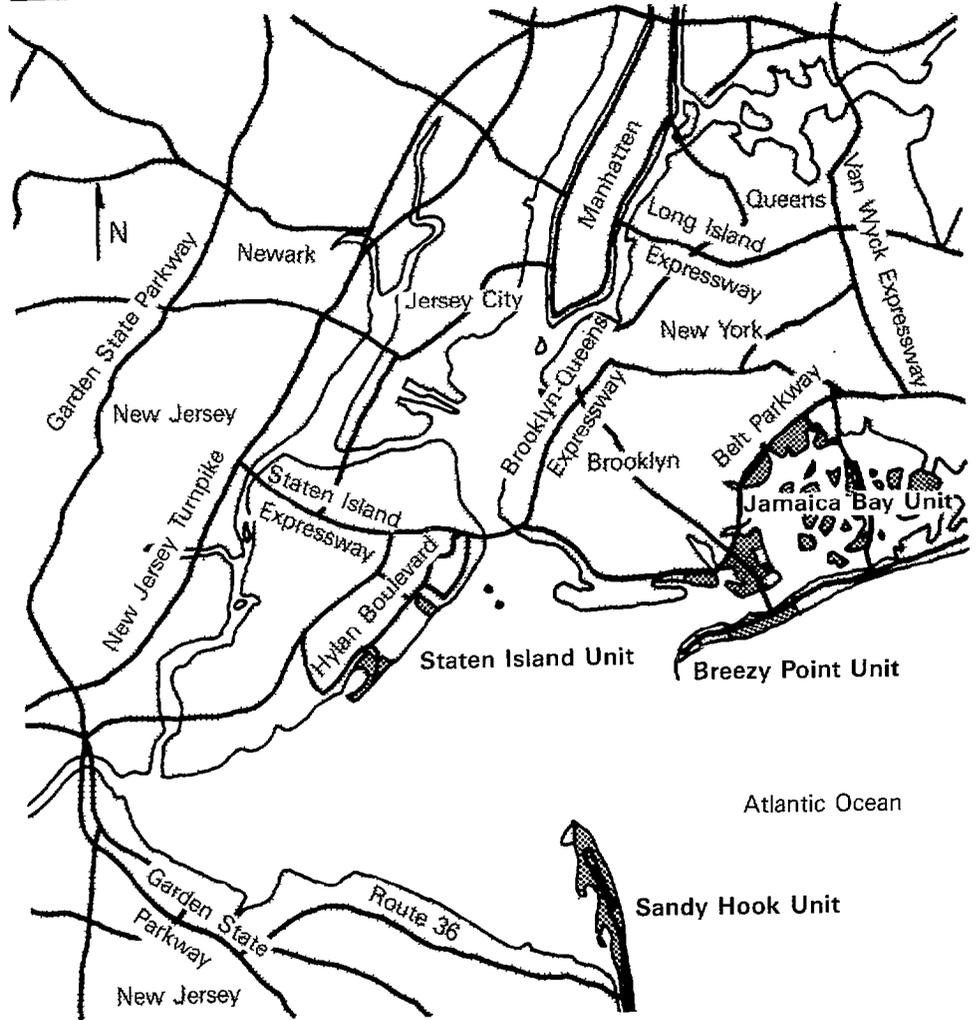
Selection of the Park Police to provide visitor protection at the two gateways was based primarily on requests by the Park Service's North Atlantic and Western Regional Directors, who are responsible for the oversight of park operations at Gateway and Golden Gate, respectively. The regional directors cited the Park Police's readiness to assume the enforcement responsibilities on the basis of their proven urban police capabilities. Since Park Rangers had no formal police training program until 1976, the Park Service did not consider Park Rangers capable of providing law enforcement at either of the two new urban parks in 1974.

Gateway and Golden Gate Offer Recreational Opportunities to Urban Residents

Gateway has about 26,000 acres and is composed of four units (specific sections of the park identified by their geographical location) in the New York harbor area—Jamaica Bay, Breezy Point, and Staten Island, New York; and Sandy Hook, New Jersey. Gateway's beaches, marshes, islands, and adjacent waters attracted about 10 million visitors in 1984

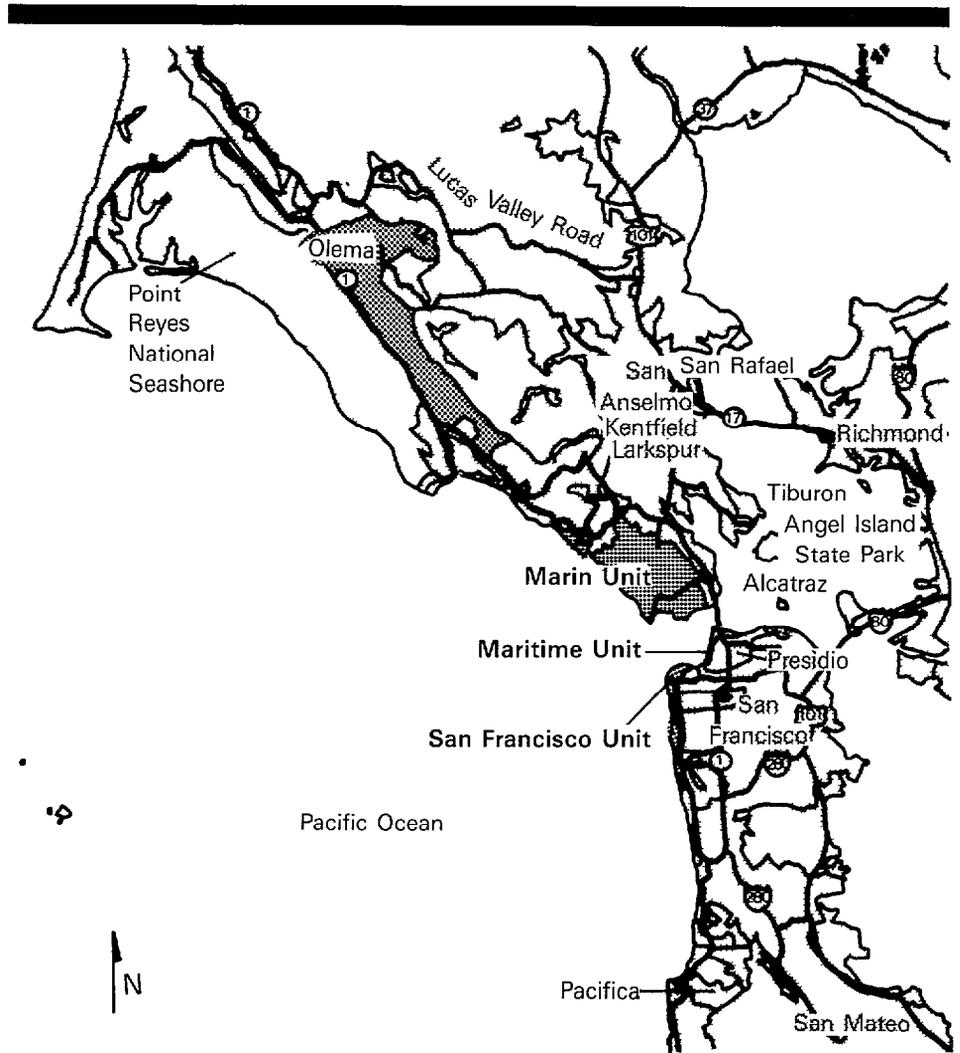
Golden Gate, with about 73,000 acres, is the largest urban park in the world and is nearly 2.5 times larger than the city of San Francisco. Golden Gate is located in three California coastal counties—Marin, San Francisco, and San Mateo. Its ocean beaches, redwood forest, lagoons, marshes, ships of the National Maritime Museum, historic military properties, culture center at Fort Mason, and Alcatraz Island (site of a famous penitentiary) attracted about 20 million visitors in 1984 and made Golden Gate one of the most popular national parks. Figures 1.1 and 1.2 provide the locations of both Gateway and Golden Gate unit areas, respectively. Appendix II provides a detailed unit description of Gateway and Golden Gate.

Figure 1.1 Gateway National Recreation Area



Source: National Park Service

Figure 1.2 Golden Gate National Recreation Area



Source: National Park Service.

Law Enforcement Role of the Park Service

The Park Service's law enforcement powers are provided for in the "General Authorities Act" (Public Law 94-458), 16 U.S.C. 1a-6, which gives the Secretary of the Interior specific statutory authority to designate Park Service employees to maintain law and order and protect persons and property within the park system.

The Park Service's ability to exercise law enforcement powers at Gateway, Golden Gate, and other park areas is defined by three jurisdictional statutes under which the federal government holds land. In

“exclusive” jurisdiction areas, legal authority rests with the federal government, thus generally precluding state and local agencies from exercising legal authority. In “concurrent” jurisdiction areas, state and federal agencies can both exercise legal authority. In “proprietary” jurisdiction areas, the federal government has acquired title to land within a state but none of the state’s legal authority over the land. A mixture of these land jurisdictions at both gateways creates a complex law enforcement environment in which the Park Service’s two law enforcement organizations, the Park Police and the Park Rangers, must routinely operate.

The Park Police

The Park Police is an urban-oriented police force that evolved from Park Watchmen for the Capital City, established in 1791 for the District of Columbia; they have been known as the Park Police since 1919. They patrol the national park areas and monuments in the Nation’s Capital and the surrounding counties of Maryland and Virginia. The Park Police “. . . have and perform the same powers and duties as the Metropolitan police of . . . [the] District” (Aug. 5, 1882, Ch.389, 22 Stat. 243). On a daily basis, Park Police encounter the same types of problems and dangers that metropolitan police encounter. In February 1985, the Park Police had a total of 529 sworn officers.

The Park Rangers

Permanent and seasonal (usually employed for a specific period of less than 1 year) Park Rangers provide naturalist, interpretive, and resource management services within the National Park System. Historically, Park Rangers have also been responsible for protecting park system areas even before they were officially called “rangers” in 1905. However, the statutory authority allowing Rangers to legally enforce regulations in Park Service areas was vague and did not give them expressed permission to carry firearms or make arrests for federal crimes until the “General Authorities Act” (Public Law 94-458) became law in 1976. The 1976 act established a law enforcement role for Park Rangers by authorizing them to carry firearms, make arrests, serve warrants, and conduct investigations in the absence of or in cooperation with other federal law enforcement agencies. The Secretary of the Interior has expressly limited these law enforcement powers to Park Rangers who have received “commissions” as a result of special police training. Of the approximately 6,000 permanent Park Rangers, about 2,100, or 33 percent, have received law enforcement commissions as of January 1985.

Park Police Presence at Gateway and Golden Gate Has Generated Congressional Concern

The 1974 permanent assignment of Park Police to Gateway and Golden Gate has become the focus of congressional interest. The Senate Committee on Appropriations noted in its August 1984 report on the Department of the Interior and Related Agencies Appropriation Bill for fiscal year 1985 that, "Funding for the U.S. Park Police continues to be of concern to the Committee." The Committee pointed out that the Park Service has an obligation to protect both park resources and park visitors. According to the Committee, over 2,100 Park Rangers with law enforcement commissions enforce the law at every national park outside the Nation's Capital without Park Police assistance except at the two gateways, where law enforcement is shared between the Park Police and commissioned Park Rangers. The Committee also noted that Park Police positions cost about 30 percent more per position than permanent Rangers with commissions. Table 1.1 shows the number of Park Police and commissioned Rangers assigned to Gateway and Golden Gate as of September 30, 1984.

Table 1.1: Park Police and Commissioned Park Rangers Assigned to Gateway and Golden Gate as of September 30, 1984

	Gateway	Golden Gate	Total
Park Police	47	37	84
Commissioned Park Rangers	15	19	34

The Committee recommended replacing the Park Police with commissioned Park Rangers at Gateway and Golden Gate. Subsequently, on October 24, 1984, the Chairmen of the Subcommittees on Interior and Related Agencies, House and Senate Committees on Appropriations, requested that we review the law enforcement capabilities and costs involved in replacing Park Police with commissioned Park Rangers at Gateway and Golden Gate.

Objectives, Scope, and Methodology

In response to the Subcommittee Chairmen's October 24, 1984, request letter and subsequent meetings with their offices on November 20, 1984, and February 6, 1985, we agreed to address the following three principal issues of a proposed replacement:

- Effects on visitor safety, protection, and enjoyment.
- Effects on comparative personnel compensation, benefits, and pension contribution costs of providing the 1984 level of visitor protection with commissioned Park Rangers.
- Effects on the government's pension fund costs.

Our review included interviews with and documentation and information obtained from Park Service officials at the North Atlantic (Boston, Mass.), Southeast (Atlanta, Ga.); Southwest (Santa Fe, N.M.), and Western (San Francisco, Calif.) regions; Washington, D.C., headquarters offices; and Gateway and Golden Gate. We interviewed commissioned Park Rangers and Park Police officials at both gateways to determine their law enforcement roles.

We also reviewed visitor complaints and obtained copies (where available) of the most recent Park Service regional evaluations of law enforcement operations and other studies involving the visitor protection activities of the Park Rangers and Park Police.

In addition, we visited nine other selected Park Service areas in California, Florida, Georgia, Louisiana, Nevada, and Ohio to obtain opinions and information from park management officials regarding the law enforcement and visitor protection capabilities and performance of commissioned Park Rangers. We selected the parks as a result of discussions with the Subcommittees' staffs and Park Service officials who suggested that a review of Park Ranger law enforcement performance at parks in urban locations or parks with high visitation/crime rates would be most appropriate in comparison to Gateway and Golden Gate. At these locations, we obtained the opinions of Park Superintendents and Chief Park Rangers on the appropriateness of a proposed Park Ranger substitution.

We reviewed park statistics on the number of visitations, and the number and types of law enforcement-related complaints and offenses reported during 1984. We also obtained the number and General Schedule (GS)² grade levels of commissioned Park Rangers and a description of their duties.

We contacted officials of federal, state, and local law enforcement agencies and other agencies or offices that have cooperative law enforcement agreements or otherwise interface with Park Police and/or commissioned Park Rangers at Gateway and Golden Gate to obtain their opinions and information regarding the ongoing need for Park Police at the gateways and the proposed replacement. We also visited with officials at the Federal Law Enforcement Training Center (FLETC), Glynco, Georgia, to obtain their opinions and information on the comparative law enforcement training and capabilities of Park Police and permanent

²The pay system administered by the Office of Personnel Management that covers most federal employees in white-collar occupations.

commissioned Park Rangers. Information on the law enforcement training and capabilities of seasonal commissioned Park Rangers was obtained from officials at the Cuyahoga Community College, Park Ranger Law Enforcement Training Center, Ohio. Appendix III lists all of the locations that we visited and the rationale for specific park selection.

In addition to identifying training requirements, we identified the duties and compared the law enforcement activities of the Park Police and commissioned Park Rangers at Gateway and Golden Gate. We also gathered information and opinions regarding the law enforcement performance of commissioned Park Rangers from Park Police officials, state and local police, and Park Service officials at nine other park system locations.

Although we reviewed a variety of Park Police and commissioned Park Ranger performance factors—such as the levels and types of offenses recorded by each, visitor complaints, and opinions of state and local police officials—to determine Park Rangers’ law enforcement capabilities, we did not compare Park Police and Park Ranger case closure rates. We found that because Park Police, Park Rangers, and law enforcement agencies in general use different criteria to determine case closures, a meaningful analysis could not be developed with a sufficient degree of confidence.

To evaluate the possible fiscal year 1984 effects on law enforcement personnel compensation, benefits, and federal pension contribution costs resulting from a hypothetical replacement of Park Police at the two gateways with commissioned Park Rangers and the pension fund effects resulting from the termination of Park Police positions, several assumptions were incorporated in our analysis with the agreement of the Subcommittee offices and Park Service officials, including the following:

- Commissioned Park Rangers would replace Park Police on a one-for-one basis, which is contingent upon the Gateway and Golden Gate Superintendents’ proposed Park Ranger personnel replacement structure.
- 50 Park Police would be relocated from Gateway and Golden Gate to Washington, D.C., and the remaining officers who did not retire or otherwise relocate would be terminated and not reemployed by the federal government.
- All of the Park Rangers needed for replacement would be transferred from other park system locations throughout the country and replacement hiring, if any, would not be considered.

- Park Police replacement by Park Rangers would have hypothetically occurred during fiscal year 1984 (the last full year for which actual operating costs were available). Also, to keep our analysis less complex, we presented the projected replacement costs in 1984 dollars.

Since Park Service officials told us that equipment, operation and maintenance, and administrative costs would not significantly change as a result of the proposed replacement, they were not included in our cost comparison analysis. Likewise, our analysis did not include Park Police civilian staff personnel costs since Park Service officials believed that civilian personnel costs would probably not change if the Park Rangers took over. Our analysis also included Park Ranger and Park Police relocation costs that may have been incurred if Park Rangers had replaced the Park Police. At our request, Park Service officials at Gateway and Golden Gate developed proposed Park Ranger replacement units that mirrored the Park Police 1984 coverage patterns at the two gateways. Park Ranger grade levels were assigned by the officials on the basis of their estimate of the respective positions when compared with similar Park Ranger law enforcement activities of similar size.

We made our review in accordance with generally accepted government auditing standards. Our review was conducted between January and December 1985.

Ability of Park Rangers to Provide Visitor Protection and Enjoyment at Gateway and Golden Gate

Park Rangers have historically protected national park areas. However, the Park Service did not believe that Park Rangers were adequately prepared in 1972 to assume the law enforcement responsibilities at Gateway or Golden Gate and, instead, assigned those responsibilities to the Park Police. Subsequently, the Park Service established a voluntary commissioning program for Park Rangers that has provided them with formal police training. As a result, commissioned Park Rangers are now considered capable of protecting visitors and park resources throughout the park system, including Gateway and Golden Gate. Park Service officials stated, however, that several other factors, such as recruitment, retention, and attitudes of commissioned Park Rangers, in addition to training, personnel costs, and obtaining off-federal-parkland law enforcement authority for commissioned Park Rangers should be considered before commissioned Park Rangers replace Park Police at Gateway and Golden Gate.

Law Enforcement Authority of the Park Service

Although Park Rangers have historically been responsible for protecting park areas, significant changes in the Ranger's law enforcement role occurred in the early 1970's. According to a 1970 International Association of Chiefs of Police study for the Park Service, an increasing burden was being placed on the Park Ranger in the areas of people management and law enforcement, in contrast to the resource-protection emphasis they had traditionally known. The report noted that this burden stemmed from the "... growth in public use in national parks and the growing tendency to disregard park regulations and the rights of others."

A major incident supporting the findings of this study occurred at Yosemite National Park in July 1970. Several hundred young people gathered in the park and drew complaints of "dope, profanity, nudity and sex" from other park visitors. After the group ignored a curfew, Rangers on horseback drove them from the park, but when the group returned the following day, the Rangers were met with bottles and rocks. In the hours that followed, nearly 100 police officers from nearby communities assisted the Rangers in quelling the disturbance. Referring to this incident 2 years later, a Park Service Assistant Director wrote, "The rangers, including a number of seasonal employees, were desperately trying to handle a situation for which they were ill equipped by reason of training, equipment, and ideology."¹

¹RANGER: The Journal of the Association of National Park Rangers, Vol. 1, No. 2, spring 1985.

In order to accomplish its expanding people management function, the Park Service had to overcome a major problem—the statutory authority allowing Rangers to enforce regulations in Park Service areas was vague and did not give them expressed permission to carry firearms or make arrests for federal crimes. Relief came in 1976 when the Congress enacted the General Authorities Act. It authorized the Secretary of the Interior to designate certain officers or employees of the Department to maintain law and order and protect persons and property within areas of the National Park System. In the performance of such duties, the designated officers or employees, may

- carry firearms and make arrests without warrant for any offense against the United States committed in their presence or for any felony cognizable under the laws of the United States if they have reasonable grounds to believe that the person to be arrested has committed or is committing a felony, provided such arrests occur within the park system or the person to be arrested is fleeing from the park to avoid arrest;
- execute any warrant or other process issued in connection with an offense committed in the park system; and
- conduct investigations of offenses against the United States committed in the park system in the absence of investigation by any other federal law enforcement agency having investigative jurisdiction over the offense committed or with the concurrence of that agency.

Under this statute, the Director of the National Park Service granted all Park Police officers and other Park Service employees who possess law enforcement commissions the right to exercise the authority of 16 U.S.C. 1a-6(a). Park Police and commissioned Park Rangers have the authority to enforce all federal laws, which includes the authority to enforce the law of states in areas of the park system under exclusive or concurrent legislative jurisdiction of the United States through the Assimilative Crimes Act of 1970, which assimilates state laws into federal law (18 U.S.C. 7 (3), 13).

Local law enforcement agencies are without power in areas of federal exclusive jurisdiction but can enforce state and local laws in areas of concurrent and proprietary jurisdiction. On proprietary lands within the park system, misconduct constituting a crime against persons or property is generally not a federal offense. Instead, it is an offense punishable under the criminal code of the state where the land is located, and enforcement depends on the availability of state and local law enforcement personnel or their willingness to commission Park Service

employees as deputy sheriffs. However, Park Police officers and commissioned Park Rangers can enforce park regulations (36 C.F.R. 1-7 and 13) even on proprietary lands.

Deputy United States Marshals

In addition to the law enforcement authority conferred by the General Authorities Act, Park Police assigned to Gateway and Golden Gate are deputized as Deputy U.S. Marshals. The authority of U.S. Marshals is defined in 18 U.S.C. 3053, which states:

“United States marshals and their deputies may carry firearms and may make arrests without warrant for any offense against the United States committed in their presence, for any felony cognizable under the laws of the United States if they have reasonable grounds to believe that the person to be arrested has committed or is committing such felony.”

A comparison of the arrest authority a Park Police officer has as a Deputy U.S. Marshal at Gateway and Golden Gate and the arrest authority a Park Police officer or commissioned Park Ranger has under 16 U.S.C. 1a-6(a) reveals no significant differences. However, as Deputy U.S. Marshals, Park Police officers are empowered to make arrests outside the parks in contiguous areas for offenses against the United States. Legal authority granted under 16 U.S.C. 1a-6(a), on the other hand, restricts Park Rangers’ arrest authority to areas only within the park system. The Park Police and commissioned Park Rangers are authorized under 16 U.S.C. 1a-6(a) to make arrests outside the parks when an offender is attempting to flee from the commission of a crime in the park.

Peace Officer Status

Park Police officers assigned to Golden Gate have also been deputized as peace officers by the Sheriffs of Marin and San Mateo counties and the Chief of Police, San Francisco. In New York, where part of Gateway is located, the Park Police have also been given many of the powers of peace officers.

Peace officer status generally gives each officer, on and off duty, the power to enforce state laws and, on federal lands that are of concurrent or proprietary jurisdiction, the power to prosecute offenders through the local courts. Local jurisdictions have granted commissioned Park Rangers at Gateway’s Sandy Hook unit peace officer status. The state of New Jersey granted peace officer status to commissioned Park Rangers assigned to Gateway until 1983, when state legislation granting police

powers to certain federal law enforcement officers omitted Park Rangers. An amendment was submitted before the state legislature in 1985 to correct the omission, but no action was taken on the bill before the end of the 1985 legislative session. New York State has not granted peace officer powers to commissioned Park Rangers at Gateway or at any other Park Service areas in New York State.

A Park Service Assistant Solicitor told us that if commissioned Park Rangers were to replace the Park Police at Gateway, additional administrative procedures would be necessary to have an offender arrested by a commissioned Park Ranger and bound-over to the local jurisdiction for prosecution—as are most juvenile offenses. Without peace officer status, local police would be needed in the arresting procedure.

The Commander of the New York Police Department's 100th Precinct, which abuts Gateway lands at the Breezy Point unit, was similarly concerned that the absence of Park Ranger peace officer powers would require his officers to become involved in arresting offenders being prosecuted by the local jurisdiction, whereas, Park Police are now able to process the offenders without local police involvement. Gateway's Superintendent and Park Police Commander also pointed out that without peace officer powers granted by New York State, commissioned Park Rangers could not enforce state laws to control traffic and other visitor safety applications on lands adjacent to Gateway's boundaries which could, therefore, reduce the present level of visitor safety provided by the Park Police. These police officials also noted that increased local police support of commissioned Park Ranger law enforcement activities might require federal funding of local governments to defray the expenses of providing the increased support.

Park Ranger Law Enforcement and Natural Resources Skills

In 1977 the Park Service created a voluntary law enforcement training program for Park Rangers. Those who applied and completed the program were “. . . commissioned to carry out all law enforcement activities in national parks.”

Rangers maintain proficiency in several areas of visitor services, in addition to visitor protection. Because of their educational background, training, interest, and responsibility in the natural resources and environment of the parks, Park Rangers are generally more conscious of the management and protection of park resources than the Park Police.

Law Enforcement Commissions

As a result of the 1976 act, the Park Service developed a “commissioning” system in 1977 that required a minimum of 200 hours of basic law enforcement training for both permanent and seasonal Park Rangers who volunteer for commissions. By comparison, the Park Police were required to complete 680 hours of basic law enforcement training before being designated and sworn in as Park Police officers.

In 1980 the Park Service modified the commission into a two-tier system of law enforcement authority for Park Rangers. The “full” commission required 360 hours of basic training, and those holding it were authorized to carry out all the law enforcement functions granted by the 1976 act. The “seasonal” commission required 200 hours of basic law enforcement training and authorized its holder to

- carry firearms and make arrests,
- conduct investigations of Code of Federal Regulations violations and nonfatal motor vehicle accidents only, and
- take initial reports on felonies and fatalities and assist in follow-up investigations under the supervision and direction of a fully commissioned Park Ranger.

Since 1980 only the following modifications have occurred: the 200-hour seasonal Park Ranger basic training requirement has been increased to 240 hours, and seasonal Rangers are now authorized to become involved in the warrant-serving process.

Traditional Park Ranger Skills

Park Rangers bring a wide diversity of education, training, and special skills relative to the various resources that the parks may have, which enable them to provide many different types of visitor services not normally provided by the Park Police. These services vary considerably in both scope and complexity. They include the following:

- Law enforcement and visitor protection, including traffic direction.
- Administrative support, including public relations with park tenants, permittees, and neighboring communities.
- Interpretative assistance, including nature walks and responding to various types of information requests.
- Information on resource management and assistance.
- Search, rescue, and emergency medical services.
- Wildlife control.
- Aquatic safety services.
- Safety programs.

While no one Ranger is expected to master all these areas, commissioned Rangers are expected to be proficient as a naturalist and proficient in search and rescue operations, emergency medical help, management of the parks' various natural and other resources, interpretive guides, and other visitor assistance services.

Comparison of Park Police and Park Ranger Training

Interior's Departmental Manual (446-DM4-2) requires all permanent entry-level law enforcement personnel, including Park Police and Park Rangers, to successfully complete the appropriate basic training courses at FLETC.² Seasonal Park Rangers must successfully complete basic training provided at Park Service-approved seasonal law enforcement training academies.³ In 1978 FLETC developed a 9-week law enforcement curriculum to provide basic police training for land management agency personnel (such as the Bureau of Land Management, Forest Service, and the Park Service) with law enforcement authority. The manual also requires all permanent law enforcement officers and designated personnel to complete at least 40 hours of in-service refresher training each year. The 40 hours of training may be accomplished in a single session or done in increments throughout the year.

As one method of determining whether commissioned Park Rangers could capably provide the visitor protection requirements at Gateway and Golden Gate, we compared the basic and in-service law enforcement training of Park Police and commissioned Park Rangers and gathered information and opinions from training officials.

Basic Training

Table 2.1 shows the hours of training Park Police and commissioned Park Rangers are required to receive in nine specific law enforcement functions.

²FLETC was established in 1970 as a bureau of the Department of the Treasury to provide quality police training for federal officers.

³Seasonal Park Ranger law enforcement academies offer law enforcement training programs for persons interested in employment with the National Park Service. Academy programs are certified by the National Park Service, Division of Training. Approved training facilities are located in Sitka, Alaska; Santa Rosa, California; Littleton, Colorado; Ely, Minnesota; Sylva, North Carolina; Nelsonville and Parma, Ohio; Slippery Rock, Pennsylvania; Memphis, Tennessee; and Everett, Washington.

Chapter 2
Ability of Park Rangers to Provide Visitor
Protection and Enjoyment at Gateway and
Golden Gate

Table 2.1: Required Training for Park Police and Commissioned Park Rangers

Training	Park Police	Number of hours	
		Permanent Park Rangers	Seasonal Park Rangers
Behavioral science ^a	90	42	10
Detention and arrest	10	10	8
Driving specialties	66	56	14
Enforcement operations ^b	44	26	40
Enforcement techniques ^c	77	58	69
Firearms	44	36	34
Legal	44	36	32
Physical specialties ^d	96	34	16
Search and seizure	12	12	8
Other ^e	197	50	9
Total	680	360	240

^aIncludes courses in areas such as stress, victim awareness, crisis intervention, handling abnormals, death and dying, interviewing, testimony, and communications

^bIncludes courses in areas such as civil disturbance, terrorism, vehicle search, narcotics, radio communications, patrol procedures, and sources of information.

^cIncludes courses in areas such as crime scene photography, investigation, description and identification, fingerprinting, collection and preservation of evidence, officer safety and survival, physical security, and bombs and explosives

^dIncludes courses in areas such as personal fitness and conditioning, and self-defense.

^eIncludes courses in areas such as officer/violator relationships, post-shooting trauma, stolen cars, sex crimes, van stops, and District of Columbia/Maryland/Virginia traffic regulations. For Park Police only, this item includes 18 and 47 hours of specialized communications and policy training, respectively.

As table 2.1 indicates, the Park Police receive from 320 to 440 more hours of basic police training⁴ than permanent and seasonal Park Rangers, respectively. FLETC officials told us that the Park Police and Park Rangers receive police training in all of the same major training areas, such as firearms, physical fitness, and self-defense and attend many of the same courses together because FLETC does not segregate courses by student organization. However, the Park Police training is more intensified in each of these areas as indicated by the greater number of training hours in recognition of the full-time law enforcement duties and responsibilities of the Park Police in comparison with the part-time law enforcement functions of Park Rangers.

⁴Does not include a 9-week internal officer performance evaluation program that Park Police officers must successfully complete following basic training. Park Rangers have no comparable evaluation program.

In-Service Training

All of the FLETC officials and instructors we spoke with noted that on-the-job and annual refresher training are important factors in preparing law enforcement personnel for specific assignments. The Departmental Manual requires permanent law enforcement personnel to complete at least 40 hours of annual in-service training. Minimum training requirements (courses) are established by the Department of the Interior. The remainder of the training is targeted at developing the knowledge and skills relevant to the participants' position.

We found that the actual number of in-service training hours received by Park Police and commissioned permanent Park Rangers at Gateway and Golden Gate usually significantly exceeded the 40-hour requirement. For example, in 1984 the Park Police received about 40 and 82 hours and commissioned Park Rangers received about 64 and 93 hours of in-service training at Gateway and Golden Gate, respectively. Park Police and commissioned permanent Park Rangers attended many of the courses together at Golden Gate but separately at Gateway. Typical in-service training courses are similar for the Park Police and Park Rangers and include such topics as defensive tactics, first aid, arrest procedures, federal and state laws, and patrol procedures. Up to 8 hours of firearms requalification may also be included as part of the Park Police and commissioned Park Ranger annual in-service training requirement.

Training Officials' Views on Park Ranger Law Enforcement Training

FLETC serves as a consolidated law enforcement training facility for 59 government organizations, including the Park Police, permanent Park Rangers, U.S. Customs Service, U.S. Marshals Service, and the Immigration and Naturalization Service.

During June 1985, we discussed with the facility's administrative and training staff whether permanent Park Rangers could be expected to assume the law enforcement duties and responsibilities of Park Police Gateway and Golden Gate.

FLETC officials, including the chiefs of the behavioral science, physical techniques, legal, and programming divisions; the center's Research and Evaluation Advisor; and the Park Service's Departmental and Agency Representative told us that permanent Park Rangers (1) consistently attain some of the highest grades of FLETC graduates and (2) are highly motivated to perform law enforcement activities. All of the Park Rangers at FLETC have volunteered for their law enforcement training.

The Park Service's Departmental and Agency Representative also noted that many of the permanent Park Rangers attending FLETC had received prior seasonal law enforcement training. For example, Park Service interviews with 74 of 127 Park Rangers attending FLETC during fiscal year 1984 found that 34 of the Park Rangers had completed the departmentally approved seasonal law enforcement training program of at least 200 hours. Of the remaining 40 Park Rangers, 16 had extensive law enforcement training in excess of 100 hours prior to attending FLETC. Therefore, 50 (34 plus 16) of the 74 Park Rangers had accumulated 460 to 560 hours, or as much as 14 weeks, of law enforcement training. The remaining 24 Park Rangers did not have extensive law enforcement training to supplement their 9-week training program at FLETC.

All of the FLETC officials and instructors that we spoke with agreed that fully commissioned permanent Park Rangers are qualified and capable of enforcing the law at any national park system location, including Gateway and Golden Gate. FLETC officials noted, however, that most Park Rangers consider the law enforcement function as only one segment of their duties and responsibilities and that most Rangers have no desire to perform law enforcement on a full-time basis.

We also visited one of the seasonal Park Ranger law enforcement academies at Cuyahoga Community College, in Parma, Ohio. The academy's Assistant Director provided information showing that the academy required 280 hours of law enforcement instruction (40 hours more than required by the Park Service) for completion of the spring 1985 program. The additional hours required by the Cuyahoga academy may not be representative of other academies' training requirements.

The majority of the academy's spring 1985 students had little or no law enforcement training or experience—of 16 students, 13 had no prior law enforcement training, 14 had no previous law enforcement experience, and 13 had no related park experience. However, the Assistant Director believes that the academy's law enforcement instruction coupled with adequate supervision by commissioned Park Rangers enable the academy's graduates to satisfy the Park Service's law enforcement demands. The Assistant Director noted that many commissioned seasonal Park Rangers return to the Park Service year after year and have become as competent in law enforcement as most permanent Park Rangers. However, he also noted that seasonal Park Rangers with less law enforcement experience should not be expected to be as competent as permanent Park Rangers or Park Police officers.

Comparison of Park Police and Park Ranger Performance

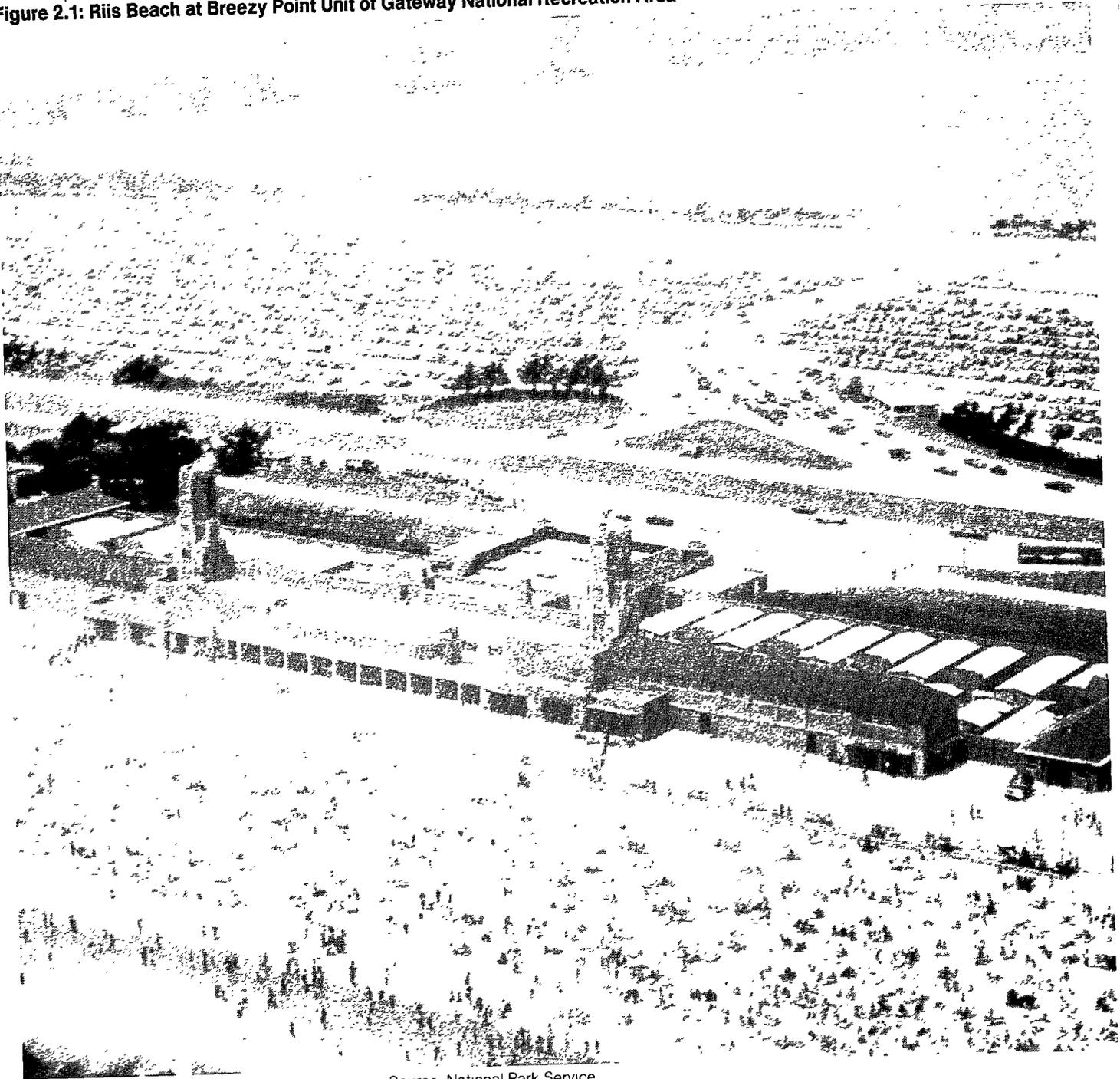
Park Service, Park Police, state and local law enforcement officials, and others believe that commissioned permanent Park Rangers are capable, as shown by their actual performance, of providing visitor and resource protection at Gateway and Golden Gate. However, there were some reservations concerning the dependability of commissioned seasonal Rangers in coping with the law enforcement requirements at urban parks. Park Service and Park Police officials also noted that several other concerns regarding a possible replacement need to be addressed before such an action is initiated.

Law Enforcement Activities at Gateway and Golden Gate

Law enforcement at the two parks is divided between the Park Police and commissioned Park Rangers by park areas. Park Police are assigned to the park units that are nearest to the urban population centers. At Gateway, the Park Police have the law enforcement responsibilities for the Breezy Point, Jamaica Bay, and Staten Island units. Commissioned Park Rangers are responsible for law enforcement at the Sandy Hook unit. The Park Police have the law enforcement responsibility for all of the urban portions of Golden Gate in San Francisco and part of Marin County, while commissioned Park Rangers are responsible for law enforcement in the rural areas of Marin and San Mateo counties (about 90 percent of Golden Gate).

In 1984 commissioned Park Rangers at Gateway spent from about 25 percent of their time during the winter months to 95 percent during the summer months performing law enforcement duties. At Golden Gate, law enforcement duties accounted for about 20 to 25 percent of the commissioned Park Rangers time year-round. Two popular beach areas—one at Gateway and one at Golden Gate—are shown in figures 2.1 and 2.2, respectively.

Figure 2.1: Riis Beach at Breezy Point Unit of Gateway National Recreation Area



Source: National Park Service

Chapter 2
Ability of Park Rangers to Provide Visitor
Protection and Enjoyment at Gateway and
Golden Gate

Figure 2.2: Golden Gate National Recreation Area Beach in Marin County



Source National Park Service

As shown in table 2.2, the largest number of crimes reported at both gateways involve acts against property rather than persons. For example, the 1984 crimes against property at Gateway and Golden Gate accounted for about 84 percent and about 83 percent of all Type I reported offenses,⁵ respectively.

Table 2.2: Type I Reported Offenses During 1984^a

Type of felony	Gateway		Golden Gate
	Park Police	Park Rangers	Park Police and Park Rangers
Persons:			
Criminal homicide	1	0	2
Rape	2	2	2
Robbery	3	0	13
Assault	18	11	49
Subtotal	24	13	66
Property:			
Burglary	30	11	19
Larceny	101	33	294
Motor vehicle theft	6	1	9
Arson	10	1	4
Subtotal	147	46	326
Total	171	59	392

^aGolden Gate offenses were not recorded separately for Park Police and Park Rangers

Park Rangers at Gateway responded to similar Type I offenses in 1984 as Park Police did as shown in table 2.2. A review of the reported offenses and discussions with law enforcement officials at both gateways also disclosed that the major portion of crimes committed there are Type II offenses.⁶ For example, in 1984 the respective Park Police's and commissioned Park Rangers' records at Gateway showed that 930 plus 479, or 86 percent, of the total 1,639 recorded crimes at Gateway were for Type II offenses. Similarly, at Golden Gate the combined Park Police's and commissioned Park Rangers' record showed that 744, or 65 percent, of the total 1,136 recorded crimes were for Type II offenses.

The Chief of the Park Police noted that the above criminal statistics may not completely represent the types of crimes responded to by Park

⁵Type I crimes are offenses of murder, forcible rape, robbery, aggravated assault, burglary, larceny-theft, and motor vehicle theft. Park Service tabulations also include arson cases recorded since 1981.

⁶Type II crimes are offenses of vandalism, drug violations, white-collar fraud, disorderly conduct/intoxication, traffic violations, and resource violations.

Chapter 2
Ability of Park Rangers to Provide Visitor
Protection and Enjoyment at Gateway and
Golden Gate

Police and commissioned Park Rangers because of the differences in the way a Park Police officer and Ranger may interpret a particular offense. For example, he noted that a Park Police officer may report a particular offense as assault, whereas, a Park Ranger may report the same offense as disorderly conduct.

Visitor Complaints

Our review of Gateway's and Golden Gate's records disclosed no substantial visitor complaints against Park Police or Park Rangers during 1984 at either location.

Law Enforcement at Other Park Locations

As another method of evaluating commissioned Park Rangers' capabilities of providing a safe and secure Gateway and Golden Gate environment for visitors and park resources if they replaced the Park Police, we reviewed commissioned Park Rangers' law enforcement activities at nine other park system locations. We selected the parks because they were classified as urban parks by the Park Service or identified by Park Service officials as having a high frequency of visitations or serious offenses. Table 2.3 shows the number of visitors and offenses recorded at each of the nine parks during 1984.

Table 2.3: Visitations and Offenses Recorded by Park Rangers at Nine Selected National Parks During 1984

Park	Visitations	Type I offenses	Frequency of Type I offenses per million visitations
Biscayne National Park	341,000	22	65
Chattahoochee River National Recreational Area	813,000	78	96
Cuyahoga Valley National Recreation Area	1,029,000	60	58
Everglades National Park	632,000	51	81
Jean Lafitte National Historic Park and Preserve	1,221,000	8	7
Lake Mead National Recreation Area	6,504,000	275	42
Point Reyes National Seashore	2,058,000	37	18
Santa Monica Mountains National Recreation Area	496,000	9	18
Yosemite National Park	2,843,000	542	190
Total	15,937,000	1,082	
Average frequency of offenses			64

Park officials at the nine parks said that their commissioned permanent Park Rangers also perform a variety of visitor protection functions, including emergency medical services and search and rescue operations. They said that not only are their commissioned permanent Park Rangers capable of performing all of the duties required in visitor protection but they have also demonstrated their law enforcement skills during daily activities such as felony investigations and arrests, foot and motorized day and night patrols, vehicle stop/searches/ seizures, and drug enforcement operations.

They also agreed that seasonal commissioned Park Rangers have a range of law enforcement abilities between the first-year “rookie” to the multi-year, “seasoned” Ranger. However, they believe most seasonals can handle the law enforcement demands in the Park Service with adequate supervision and continued experience.

Although in general agreement with the other park officials, Yosemite’s Chief Law Enforcement Park Ranger believes the average commissioned Park Ranger does not possess a criminal investigative ability comparable to that of a full-time law enforcement officer, such as the Park Police, because of the Ranger’s lack of investigative experience. Conversely, the Assistant Superintendent at Lake Mead emphasized that commissioned Park Rangers’ diverse educational background, skills, and interests enhance their law enforcement versatility beyond that of the typical policeman. The Superintendent at Point Reyes National Seashore, California, also agreed that commissioned Park Rangers have diverse abilities that enhance their law enforcement performance. He noted that commissioned Park Rangers are responsible for providing law enforcement at Point Reyes and do it very well.

**Views of Park Service and
Other Police Officials on
Commissioned Park Ranger
Performance**

We questioned Park Service and Park Police headquarters, regional, and Gateway and Golden Gate officials regarding commissioned Park Rangers’ general law enforcement capabilities.

These officials generally agreed that commissioned permanent Park Rangers, if provided with similar law enforcement authority, could capably provide the same level of visitor and park resource protection as the Park Police. For example, the Park Service’s Director of the National Capital Region and the Chief of the Park Police stated that commissioned permanent Park Rangers could capably perform law enforcement at either Gateway or Golden Gate. The Park Service’s

Chapter 2
Ability of Park Rangers to Provide Visitor
Protection and Enjoyment at Gateway and
Golden Gate

North Atlantic Regional Director and Chief Ranger also agreed that commissioned permanent Park Rangers are as capable as Park Police and because of their versatility, more cost-effective as well.

The Park Service's Western Regional Director stated that commissioned Park Rangers today are better trained than when the gateways were initially established because of the 1976 General Authorities Act and the Park Ranger law enforcement commissioning program. In addition, a former commander of the Park Police at Golden Gate described commissioned permanent Park Rangers as "very capable at law enforcement." Superintendents at the two gateways said that they have not seen any major differences between the law enforcement capabilities of Park Police and commissioned permanent Park Rangers at either location. The Gateway Superintendent added that he is not aware of any law enforcement incident at Gateway that commissioned permanent Park Rangers were not capable of handling. Although it may take some time for commissioned Park Rangers to gain as much crowd control proficiency as the Park Police now have, commissioned Park Rangers at both gateways told us that they had the appropriate training and could handle the law enforcement responsibilities and duties required at both gateways with on-the-job experience.

Park Police officers assigned to Gateway and Golden Gate also said that commissioned permanent Park Rangers could perform their law enforcement duties at the two locations. They were less confident that commissioned seasonal Park Rangers could perform law enforcement duties at comparable Park Police levels of proficiency.

We also obtained the opinions of military, state, and local police officials whose law enforcement jurisdictions abut Gateway and Golden Gate. None of the police officials familiar with commissioned Park Rangers' duties expressed any reservations regarding their law enforcement capabilities.

Most of the police officials, including an Assistant Commissioner with the New York City Police Department, believed that their police departments could work as easily with commissioned Park Rangers as they have with the Park Police. However, as previously noted in this chapter, some local police officials were concerned about the absence of Park Ranger peace officer powers.

Other Factors That May Affect Performance

According to Park Service, Park Police, and field office officials, any decision to replace Park Police at Gateway and Golden Gate with commissioned Park Rangers should, in addition to ability and personnel costs, consider such factors as: resource flexibility, law enforcement attitudes and image, and salary differences. Chapter 3 presents a detailed discussion of personnel cost comparisons of Park Police and Park Rangers.

Resource Flexibility

Park Police are trained to be primarily responsible for law enforcement careers. Commissioned Park Rangers, on the other hand, are career oriented in natural resource management and visitor service areas, as well as law enforcement. For example, in recent years, Golden Gate's commissioned Park Rangers have spent at least 75 percent of their time in nonlaw enforcement activities, which include such diverse activities as

- providing off-site interpretive services to schools and clubs,
- giving slide shows,
- preparing environmental impact statements on park resources, and
- coordinating maintenance with other visitor services.

The Park Rangers' ability to provide such services affords park superintendents more flexibility to fully use commissioned Park Rangers in areas that enhance visitor enjoyment all-year-round. This is particularly important at the more seasonal Gateway park, where 78 percent of the 1984 visits occurred from June through September. (Only 43 percent of Golden Gate's visitations occurred during the same period.) However, the Gateway and Golden Gate Superintendents, Chief Rangers, and Park Police Commander noted that utilizing commissioned Park Rangers' diverse abilities to provide additional visitor services may be severely limited if Park Rangers replaced Park Police at both gateways on a one-for-one basis. They noted that providing the same Park Police law enforcement coverage with a similar number of Park Rangers, especially during the high-visitation summer months, would limit their activities to law enforcement, thus leaving little opportunity to use Park Rangers' other abilities.

Attitudes and Law Enforcement Image

Park Rangers' law enforcement attitude was one of the most frequent considerations identified by Park Service and Park Police officials. According to the Park Service's Associate Director for Park Operations, Park Rangers' attitudes are different from those of Park Police officers. Park Rangers, he noted, join the Park Service primarily to be involved in

the traditional interpretive, historical, naturalist, and resource management activities. Park Rangers only consider law enforcement duties as one of many responsibilities. Park Police, on the other hand, are full-time law enforcement officers and are primarily responsible for enforcing federal and state laws and Park Service regulations.

Many of the Park Rangers and Park Police officers we spoke with confirmed the Associate Director's opinion. However, commissioned Park Rangers at various park locations and management and training personnel at FLETC pointed out that obtaining a Park Ranger law enforcement commission is strictly voluntary. Commissioned Park Rangers' attitudes regarding their law enforcement responsibilities, therefore, may not be dissimilar from those of the Park Police, according to the Chief Law Enforcement Park Ranger at Chattahoochee River National Recreation Area. She noted that new Park Rangers realize the importance of law enforcement and accept it as part of their duties.

Another concern primarily of Park Police officials, was park visitors' ability to recognize the law enforcement authority of commissioned Park Rangers. The Commander of Park Police at Golden Gate suggested that the commissioned Park Ranger in his/her green and grey uniform, which is identical to that of a noncommissioned Ranger (except for the equipment belt/holster), may not be readily perceived by urban residents as a law enforcement authority. The Commander noted that urban residents in New York City and San Francisco relate law enforcement authority with the uniform of local police and, therefore, may not associate the Park Rangers with law enforcement. He further suggested that the Park Police uniform more closely resembles the uniform of an urban policeman.

We asked commissioned Park Rangers at both gateways and the other nine parks we visited if they had experienced any significant law enforcement authority recognition problems. Only one of the Park Rangers we questioned could provide an example of a law enforcement recognition problem. A Park Ranger at Lake Mead National Recreation Area told us that one visitor questioned his arrest authority.

Most commissioned Rangers believed that wearing the equipment belt/holster and projecting law enforcement self-confidence and professionalism are generally sufficient for obtaining visitor recognition of their law enforcement authority.

Chapter 2
Ability of Park Rangers to Provide Visitor
Protection and Enjoyment at Gateway and
Golden Gate

Figure 2.3: The Park Police Officer (Left) and Commissioned Park Ranger (Right) Shown in Summer Uniform



Source: National Park Service

**Chapter 2
Ability of Park Rangers to Provide Visitor
Protection and Enjoyment at Gateway and
Golden Gate**

Salary Differences

The Associate Director for Park Operations, the Gateway and Golden Gate Superintendents, the Chief Park Ranger at Gateway, the Chief of Park Ranger Activities at Golden Gate, and the Superintendent and Chief of Rangers at Chattahoochee River National Recreation Area were concerned that the Park Service might have problems in attracting and retaining replacement commissioned Park Rangers for assignments to the high cost-of-living areas of both parks. Park Service officials believe that the low salary structure of Park Rangers compared with Park Police officers' would create financial hardships, especially on the low graded personnel at either location. There is no additional salary compensation for obtaining a law enforcement commission. Table 2.4 provides the fiscal year 1984 salary range schedules for Park Police and Park Rangers.

Table 2.4: Fiscal Year 1984 Salary Range of Park Police and Park Rangers^a

Park Police	Park Rangers General Schedule
Private \$19,281-\$30,037 ^b	GS-5 \$13,837-\$17,986
Detective \$24,105-\$31,326	GS-7 \$17,138-\$22,277
Sergeant \$26,185-\$33,542	GS-9 \$20,965-\$27,256
Lieutenant \$30,268-\$36,321	GS-11 \$25,366-\$32,980
Captain \$35,855-\$41,224	GS-12 \$30,402-\$39,519
Major \$41,556-\$47,796	GS-13 \$36,152-\$46,997
Deputy Chief \$48,761-\$58,669	GS-14 \$42,722-\$55,538
Chief \$66,400 (capped)	GS-15 \$50,252-\$65,327
	GS-16 \$58,938-\$66,000 ^c
	GS-17, 18 \$66,000 ^c

^aEffective January 1984

^b\$28,577 was the highest salary attainable for nonpilot Park Police officers

^cCapped at \$66,000

The Associate Director for Park Operations and the North Atlantic Regional Director agreed that the salaries of Park Rangers are low in comparison to their educational, skill, and performance levels. The average grade level is "private" for Park Police and GS-5 for Park Rangers, according to Park Service headquarters records. On the basis of the fiscal year 1984 pay schedule above, the Park Police private's salary ranged from \$19,281 to \$30,037 compared with \$13,837 to \$17,986 for GS-5 Park Rangers, a salary range difference of \$5,444 to \$12,051.

Chapter 2
Ability of Park Rangers to Provide Visitor
Protection and Enjoyment at Gateway and
Golden Gate

Although the Park Service has no current turnover studies or statistics that might indicate the severity of the pay comparability problem, most Park Service management officials told us that the retention of Rangers, especially those with law enforcement commissions, is becoming one of the most serious and costly personnel problems in the Service. Park Service officials believe that the agencywide retention problem will become worse if commissioned Park Rangers replace the Park Police at Gateway and Golden Gate.

Comparison of Park Rangers and Park Police Law Enforcement Costs

Replacing 84 Park Police at Gateway and Golden Gate with 91 permanent commissioned Park Rangers in 1984 would have reduced the two parks' personnel costs by \$740,338. However, overall Park Service personnel costs would not have changed because the 84 Park Police would have had to have been reassigned within the Park Service. In addition, by only replacing the park personnel, the Park Service would have initially incurred additional relocation and training expenses of \$2.94 million and \$199,381, respectively.

Park Service personnel and pension cost savings in 1984 and subsequent years would have occurred if, in addition to replacing Park Police with Park Rangers, 30 Park Police positions were eliminated. Under this approach the Park Service would have realized (1) \$802,314 in recurring personnel compensation and benefits savings and (2) \$3.2 million in pension cost savings from eliminating the future pension entitlement of the 30 terminated officers, with an additional \$40,000 to \$1.2 million in annual recurring pension accrual savings from shifting the pension coverage for the positions to a less costly pension plan. The Park Service may have still incurred the \$199,381 in training expenses, but relocation expenses may have decreased to \$2.44 million. In addition, severance and unemployment compensation pay for the 30 Park Police may have cost as much as about \$69,000 and \$161,000, respectively, according to Park Service officials.

Personnel Compensation, Benefits, and Pension Contribution Costs

The costs incurred by the Park Service, other than personnel compensation, benefits, and pension contribution costs, would remain the same if Park Police were replaced by commissioned Park Rangers, according to Park Service officials. Therefore, we limited our comparison of law enforcement costs at Gateway and Golden Gate to personnel compensation, benefits, and pension contributions.

Park Rangers' compensation is determined by the General Schedule grade series and includes the employees' regular salary, overtime, holidays, longevity, and night and Sunday differentials. Park Rangers are under the federal employee civil service retirement program.¹ Under civil service retirement, federal employees are eligible for retirement at age 55 if they have completed 30 years of federal service. Park Police compensation is determined by separate legislation, and they are under

¹Effective January 1, 1984, new employees entering government service are covered by social security. A new civil service retirement plan to supplement social security benefits for these employees is being developed and, by law, must take effect on or before April 30, 1986.

the Police and Fireman Relief Fund retirement system—a pension program that provides full benefits after 20 years of service and is, therefore, more costly than the Civil Service Retirement System.

Personnel benefits normally include the federal government's contributions toward life and health insurance, under the Federal Insurance Contributions Act (FICA), and the retirement program of both the civil service and the Police and Fireman Relief Fund. The government's pension contribution for the Park Rangers' pension fund was 20.4 percent for fiscal year 1984. The government's contribution for Park Police is determined by the difference between the cost of pension payments to retirees or their survivors and the contributed amount from salaries (7 percent for fiscal year 1984) of Park Police officers. For example, the pension payments to Park Police retirees or their survivors was about \$460,000 for March 1985, and the contributed amount from Park Police salaries was about \$78,000 for that month. The difference of about \$382,000 was the government's contribution. Therefore, a decrease in the Park Police-contributed amount to the pension fund, resulting from the termination of 30 officers, would increase the government's contribution share by a like amount.

**Actual Law
Enforcement Costs at
Gateway and Golden
Gate**

In fiscal year 1984, Gateway and Golden Gate incurred about \$12.2 million and \$9.4 million in total park costs, which included law enforcement personnel costs of about \$2.3 million and \$1.7 million, respectively. Table 3.1 presents the actual law enforcement personnel compensation benefits, and pension contribution costs at Gateway and Golden Gate during fiscal year 1984.

**Chapter 3
Comparison of Park Rangers and Park Police
Law Enforcement Costs**

Table 3.1: Actual Law Enforcement Personnel Costs for Fiscal Year 1984

Park Police (84)	Gateway	Golden Gate	Total
Compensation	\$1,250,200	\$1,031,700	\$2,281,900
Benefits	72,096	48,582	120,678^a
Pension contribution	371,500	285,700	657,200
Subtotal	1,693,796	1,365,982	3,059,778
Emergency costs	381,040 ^e	34,126	415,166
Subtotal	2,074,836	1,400,108	3,474,944
Commissioned Park Rangers (32)			
Compensation	141,930	275,440	417,370^b
Benefits	8,694	16,726	25,420^c
Pension contribution	25,704	49,449	75,153^d
Subtotal	176,328	341,615	517,943
Total	\$2,251,164	\$1,741,723	\$3,992,887

^aThis is an estimate based on a review of the actual amount provided for all employees and an annual projection of one payroll period

^bThis includes an estimate for premium pay based on a ratio of the regular salary cost of Rangers with law enforcement commissions to the total regular Ranger salary costs charged to law enforcement.

^cBased on OMB Circular A-76, 6.9 percent of basic salary

^dBased on OMB Circular A-76, 20.4 percent of basic salary.

^eIncludes overtime by Park Police temporarily assigned from Washington for the summer and weekends and Washington Park Police covering for those temporarily assigned from Washington to Gateway.

A total of about \$3.99 million in law enforcement personnel compensation and benefit costs, including the federal pension contributions, was incurred at Gateway and Golden Gate during fiscal year 1984. This amount includes a total of \$415,166, which Park Police charged for emergency needs, including overtime and other benefit costs at the two parks. The major part of the total costs (about \$3.5 million) was incurred by the 84 Park Police officers permanently assigned to both gateways.

Estimated Law Enforcement Costs at Gateway and Golden Gate if Commissioned Park Rangers Had Replaced Park Police

The park superintendents of both gateways provided us with their estimates of the personnel staffing requirements (on a one-for-one basis, if possible) that would have been necessary for similar law enforcement coverage at both parks during fiscal year 1984, if commissioned Park Rangers replaced the Park Police. Although we planned to compare the personnel costs on a one-for-one basis, Gateway officials submitted a personnel schedule requiring a permanent full-time staff of 54 commissioned Rangers for law enforcement coverage rather than 47, the number of Park Police at Gateway as of September 30, 1984. The

**Chapter 3
Comparison of Park Rangers and Park Police
Law Enforcement Costs**

Gateway Superintendent told us that the 47 Park Police assigned to Gateway are insufficient to provide 24-hour, 7 days-a-week coverage, as well as special events coverage, without the extensive use of overtime, especially during the summer months. He determined that 54 commissioned Park Rangers were needed to avoid the continued use of overtime. Golden Gate officials submitted a personnel schedule on a one-for-one basis as requested.

Table 3.2 presents the estimated replacement law enforcement personnel compensation, benefits, and pension contribution costs that may have been incurred at Gateway and Golden Gate during fiscal year 1984 if commissioned Park Rangers had replaced the Park Police.

Table 3.2: Estimated Law Enforcement Personnel Costs for Fiscal Year 1984

Commissioned Park Rangers (91 additional)	Gateway	Golden Gate	Total
Compensation	\$1,148,941	\$ 940,185	\$2,089,126
Benefits	47,468	57,170	104,638^a
Pension contribution	140,343	169,025	309,368^b
Subtotal	1,336,752	1,166,380	2,503,132
Emergency costs	231,474	-	231,474^c
Subtotal	1,568,226	1,166,380	2,734,606
Commissioned Park Rangers (32 actual 1984)			
Subtotal (See table 3.1)	176,328	341,615	517,943
Total	\$1,744,554	\$1,507,995	\$3,252,549

^aBased on OMB Circular A-76, 6.9 percent of basic salary

^bBased on OMB Circular A-76, 20.4 percent of basic salary.

^cPart-time

About \$3.25 million in law enforcement personnel compensation and benefit costs, including the federal pension contributions, may have been incurred by the 91 replacement commissioned Park Rangers and the 32 commissioned Park Rangers previously in-place at Gateway and Golden Gate during fiscal year 1984.

Law Enforcement Replacement Cost Comparison

On the basis of the actual law enforcement personnel compensation, benefits, and pension contribution costs incurred at Gateway and Golden Gate during fiscal year 1984 and estimates of those costs that may have been incurred had 91 commissioned Park Rangers replaced the 84 Park Police, the Park Service may have realized an annual recurring personnel cost reduction at the two parks of \$740,338 as shown in table 3.3.

Table 3.3: Comparison of Actual and Estimated Law Enforcement Costs at Gateway and Golden Gate for Fiscal Year 1984

Actual	Estimated	Possible annual personnel cost reduction
\$3,992,887	—	\$740,338

While the two parks would be able to reduce their personnel benefit and compensation costs by \$740,338, overall Park Service personnel costs would not change because the 84 Park Police would have been reassigned. In addition, such an approach would increase overall Park Service costs because of additional training and relocation expenses for both the Park Police and Park Rangers reassigned.

Law Enforcement Training Expenses

The average fiscal year 1984 9-week Park Ranger law enforcement training program cost for each participant at FLETC was \$1,459. Each participant's average travel and per diem costs were an additional \$732—a total average participant cost of about \$2,191. In the event that all of the 91 replacement Rangers were not commissioned prior to replacement, the Park Service could have incurred additional replacement costs for the 9-week Park Ranger law enforcement training of as much as \$199,381.

Relocation Expenses

Park Service officials estimated that the average 1984 Park Ranger relocation cost (moving, per diem, and other travel-related expenses of the employee and his/her immediate family) was about \$18,000. The Park Police estimated that the average Park Police officer relocation cost for 1984 from Gateway and Golden Gate to Washington, D.C., was about \$8,000 and \$25,000, respectively.

Assuming that the 91 Park Rangers (the proposed number of commissioned Rangers needed to replace the 84 Park Police) had been transferred to Gateway and Golden Gate from various park system locations, and that 47 Park Police officers from Gateway and 37 from Golden Gate

(84 total) were relocated to Washington, D.C., the costs of relocation could have been as much as \$2.94 million.

Savings Would Occur From Eliminating 30 Park Police Positions

One of our review assumptions was that 50 Park Police officers located at Gateway and Golden Gate would have relocated within the Park Police organization. The remaining officers would be terminated and rehired into the federal government. As of September 30, 1984, 84 Park Police were assigned to Gateway (47) and Golden Gate (37). In addition to the 50 officers relocated within the Park Police organization, two officers would remain at Gateway and Golden Gate (one at each location) as a criminal investigator and coordinator and two officers would retire (one was already eligible on Sept. 30, 1984), leaving a balance of 30 officers that would have been terminated from federal service.

By eliminating 30 Park Police in 1984, the Park Service would have realized a recurring personnel compensation and benefits savings of \$802,314 and would have reduced its annual pension costs. This strategy significantly reduces the relocation expenses (identified earlier) although severance and unemployment compensation pay expenses would be incurred.

Personnel Compensation and Benefits Savings

The Park Police provided us with an estimated personnel compensation and benefit cost savings resulting from a possible termination of 30 of the most recent hires or junior officers (15 officers from each gateway). The Park Police estimated that as much as \$802,314 may have been saved during fiscal year 1984 if the 30 officers had been terminated as shown in table 3.4.

Table 3.4: Estimated Personnel Cost Savings if 30 Park Police Positions Were Eliminated for Fiscal Year 1984

Expense	Gateway	Golden Gate	Total
Compensation	\$373,428	\$391,409	\$764,837
Benefits	18,298	19,179	37,477
Total	\$391,726	\$410,588	\$802,314

The \$802,314 estimate, unlike the \$740,338 personnel compensation and benefits cost reduction associated with replacing 84 Park Police with commissioned Park Rangers (discussed earlier) does, in fact, represent an actual savings to the Park Service.

Reduced Pension Costs

Our analysis of the long-term effects of replacing 30 of the lowest paid Park Police officers at Gateway and Golden Gate,² showed that annual pension cost reductions could have been between \$40,000 and \$1.2 million, depending on how the Park Police and Park Service would have adjusted their personnel positions resulting from replacement. In addition, the Park Police may have experienced a present value³ gain of about \$3.2 million as a result of terminating the pension entitlement of 30 officers with the lowest salaries. The amount of this additional gain depends on the 30 officers not returning to federal employment. If any or all of the 30 officers' returned to federal employment, the \$3.2 million savings would be reduced or eliminated.

The pension fund savings resulting from the termination of 30 Park Police officers could, however, be negated if commissioned Park Rangers became eligible, as a result of their law enforcement activities at Gateway and Golden Gate for retirement benefits similar to those of the Park Police.

Park Service and Park Police officials have previously noted that if commissioned Park Rangers replaced the Park Police on a one-for-one basis, they would probably become full-time law enforcement officers in order to provide the same level of visitor protection now afforded by the Park Police. On the basis of the Park Service's experience, commissioned Park Rangers who are primarily engaged in law enforcement activities might request that their positions be reclassified in order to establish, for entitlement purposes, the actual nature of their primary duties in order to become eligible for the 20-year retirement benefit afforded the Park Police. For example, in 1979 a commissioned Park Ranger's position at Olympic National Park, Washington, was reclassified, at his request, by the Office of Personnel Management from "Park Technician" to "Criminal Investigator." The decision was based on the Ranger's extensive investigative experience. Although his duties were uncommon for commissioned Park Rangers, many Park Service and Park Police officials expect that Rangers' replacing the Park Police at Gateway and Golden Gate could be required, as a part of their normal duties, to perform investigations that could also justify the reclassification of their positions and make them eligible for 20-year retirement benefits.

²Appendix IV provides a detailed explanation of the assumptions and calculations we used in our analysis.

³The present value (1984) of a future payment represents the amount that would have to be placed in a fund earning a given rate of interest to accumulate to the payment amount on the date of payment.

Relocation Savings

The \$2.94 million estimated relocation costs for 91 commissioned Park Rangers' and 84 Park Police would be reduced by about \$500,000 to \$2.44 million if 30 Park Police were terminated—15 at Gateway and 15 at Golden Gate. (See earlier discussion of relocation costs.)

Severance Pay

Severance pay, authorized under Title 5, United States Code, is money received by a federal employee who (1) is involuntarily separated from federal service but not by removal for cause on charges of misconduct, delinquency, or inefficiency and (2) is not eligible for retirement.

Entitlement to severance pay is determined on the basis of the employees' basic rate of pay at the time of separation and years of creditable service (basic allowance). The basic allowance is computed on the basis of 1 week's basic salary for each year of creditable service for the first 10 years, and 2 weeks' basic salary for each year of creditable service thereafter.

In order to estimate the fiscal year 1984 severance pay cost of terminating 30 Park Police officers as a result of replacement, we calculated the basic allowance for the 30 lowest graded Park Police officers at Gateway and Golden Gate as of September 29, 1984.

Terminating 30 of the lowest graded Park Police officers at Gateway and Golden Gate with 5 years of average creditable service and an average weekly salary of \$460 would have amounted to an estimated severance pay cost of about \$69,000.

Unemployment
Compensation

Under the Federal Employees Compensation Act of 1916, (5 U.S.C. 8501 et. seq.) the federal government is responsible for providing payments to state agencies that, in turn, provide unemployment compensation payments to qualifying former federal employees. Although we recognize that some compensation costs could be expected, we believe it is difficult to quantify the amount with any degree of confidence, because of numerous benefit variables, including the states' unemployment compensation formulas and the actual length of the individual's unemployment period. However, Interior's report comments (see app. I) suggested that the total cost of these payments for the 30 Park Police officers, who might be terminated as a result of replacement, could be as much as \$160,680. This amount assumes that each of the 30 officers would remain unemployed and collect benefits for the maximum 26-week period.

Conclusions, Recommendation, and Agency Comments

Park Rangers have historically provided visitor and resource protection in national parks. However, the Park Service did not believe they possessed the law enforcement skills necessary to handle the increase in personal and property offenses envisioned with the creation in 1972 of two national parks located in highly populated urban areas—Gateway near New York City and Golden Gate near San Francisco. As a result, the Park Service permanently assigned Park Police to carry out law enforcement activities at the two parks. Subsequently, the Park Service established a voluntary commissioning program, which has enabled Park Rangers to acquire law enforcement skills comparable to the Park Police's.

Permanent commissioned Park Rangers, because of their law enforcement training and experience, are capable of providing visitor and resource protection at Gateway and Golden Gate, according to Park Service and other law enforcement officials. Park Rangers' skills are more diverse than those of Park Police, which might present park superintendents with more flexibility in handling nonlaw enforcement activities than is now possible with Park Police. However, additional visitor services may not be possible if Park Rangers are performing law enforcement as their major duty, especially during high visitation periods.

From a cost standpoint, replacing the Park Police at Gateway and Golden Gate in 1984 may not have decreased personnel costs because the Park Police would have been reassigned within the Park Service. In fact, overall costs may have increased because of relocation expenses (\$2.94 million for 84 Park Police and 91 commissioned Park Rangers) and \$199,381 in possible law enforcement training expenses for 91 Park Rangers.

Park Service cost savings in 1984 and subsequent years may have occurred if, in addition to replacing Park Police with Park Rangers, 30 Park Police positions were eliminated. Under this approach the Park Service might have realized (1) \$802,314 in recurring personnel compensation and benefits savings and (2) \$3.2 million in pension cost savings, and an additional \$40,000 to \$1.2 million in recurring pension accrual savings, depending on subsequent personnel actions. The Park Service might have still incurred the \$199,381 in training expenses, but relocation expenses would have decreased to \$2.44 million. In addition, severance and unemployment compensation pay for the 30 Park Police may have cost as much as about \$69,000 and \$161,000, respectively, according to Park Service officials.

Chapter 4
Conclusions, Recommendation, and
Agency Comments

However, Park Service and other law enforcement officials identified several concerns—the law enforcement status and recognition of Park Rangers, and potential recruitment and retention problems—that need to be addressed before commissioned Park Rangers could replace Park Police at Gateway and Golden Gate.

Recommendation

To assist the Congress in deciding which police force should be used at Gateway and Golden Gate, we recommend that the Secretary of the Interior assess the difficulties in recruiting, retaining, and obtaining off-parkland law enforcement authority for commissioned Park Rangers at these areas. In addition to the enforcement capabilities and cost information discussed in this report, the results of the assessment should provide the Congress with adequate information on the consequences of shifting the work force from Park Police to Park Rangers.

Agency Comments

We provided copies of this report to the Department of the Interior for review and comment. Interior stated that it agreed with our recommendation that the additional information gained through further assessment of recruitment, retention, and the difficulties of obtaining off-parkland law enforcement authority at Gateway and Golden Gate would be beneficial. Interior did not agree, however, with several of the report's statements and ensuing conclusions. Interior's disagreements generally relate to commissioned Park Rangers' law enforcement qualifications and the police authority needed to adequately provide law enforcement services in the urban areas of Gateway and Golden Gate. Interior's comments are provided, along with our responses, in appendix I.

Advance Comments From the Department of the Interior

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

January 15, 1986

Mr. J. Dexter Peach
Director
Resources, Community, and Economic
Development Division
United States General Accounting Office
Washington, D.C. 20548

Dear Mr. Peach:

We appreciate the objectivity with which this review has been conducted. Our comments in response to the proposed report, "Law Enforcement Capability and Cost Comparisons at Two Recreation Areas," are necessarily, in our judgment, quite detailed and specific. This is so inasmuch as the questions posed beg very important management questions, i.e., the level of law enforcement deemed required at these very important and unique National Park Service sites and the unacceptable consequences of attempting to change the manner in which this visitor and resource protection program is conducted.

We have no problem with the recommendation in the report, and feel that additional information gained through further assessment of recruitment, retention, and the difficulties of obtaining off park land law enforcement authority at Gateway and Golden Gate would be beneficial.

As you will note in our enclosed comments, we are not in agreement with several statements of facts and the ensuing conclusions. The urban areas within the respective Gateways that are protected by our United States Park Police are located in two of the most densely populated cities in the United States. Law enforcement in these areas is a full-time, 24-hour a day requirement. It cannot be considered as secondary or as an adjunct to the traditional visitor programs as provided by our Rangers in the suburban or more rural park areas.

Although the report takes cognizance of the fact, we think it important to emphasize that within both the Gateways, our U.S. Park Police have been assigned permanently only to the strictly urbanized and concentrated population areas whereas our Park Rangers are assigned traditional roles, including resource and visitor protection services in the suburban or more rural areas of both parks. These distinctions are important in that they reflect management's concern that urban environments require urban approaches to the National Park Service programs.

See comment 1

See comment 2.

**Appendix I
Advance Comments From the Department of
the Interior**

To conclude that our "Rangers" can provide the required 100 percent level of law enforcement at these urban National Park Service park sites and still maintain all the functions of a Ranger is a fallacy. The National Park Service management has concluded, over time, that a delicate balance of programs is required for each park and area in the System; e.g., the maintenance, visitor services, natural and cultural resource protection and visitor protection programs. The "Park Ranger" is a critical ingredient in this balance and the position is multi-faceted, requiring combinations of duties and responsibilities in interpretative and visitor safety programs, cultural and/or natural resource management, law enforcement (when properly commissioned) and other National Park Service mission related services. In short, by very definition, a "Park Ranger" transcends singular program focus. In other words, to provide the level of law enforcement required at the urban sites in the respective Gateways, such protective services would be provided by "policemen" -- by whatever professional title -- not by "Rangers."

See comment 3
Now on p. 48.

The report, on page 64, speaks to the very important issue of the personnel classification differences between a "Park Technician," (which is now an obsolete title, having in all cases been converted to "Park Ranger") and a "Criminal Investigator." As we have already pointed out, a position requiring full-time law enforcement would indeed require classification as other than "Park Ranger," and the likelihood that these positions would command a higher GS salary scale along with entitlement to 20 year retirement is an almost certainty. It is equally as important to note that these positions would be totally unique to the specified areas within the Gateways and assuming arguendo, that our Commissioned Park Rangers elsewhere in the National Park Service System would not successfully make the case for conversion to the "Criminal Investigator" series, would provide little or no opportunity for gaining the well-rounded, multi-faceted experiences necessary for mobility and advancement within the Service's organization.

See comment 4.
Now on p. 15.

In short, these would be "dead-end" positions, outside the traditional organizational realm. Yet, although superficially appearing to be "police" or "law enforcement" positions, they undoubtedly would not compete with traditional Law Enforcement Agencies in salaries and other benefits. We maintain that the serious consequences of replacing our United States Park Police at the designated areas within the Gateway Recreation Areas with non-Force personnel have not been adequately addressed by the report but that these consequences go to the very heart of the Congressional request to review "...the law enforcement capabilities... at Gateway and Golden Gate." (report, p. 16).

**Appendix I
Advance Comments From the Department of
the Interior**

As indicated, our more specific comments are enclosed.

Sincerely,



Assistant Secretary for Fish
and Wild Life and Parks

Enclosure

Appendix I
Advance Comments From the Department of
the Interior

AGENCY COMMENTS ON GAO
DRAFT REPORT ENTITLED
LAW ENFORCEMENT CAPABILITY AND COST COMPARISON
AT TWO RECREATION AREAS

Now on pp. 24 and 25.

The principal findings of GAO's report indicate that commissioned Park Rangers are capable of providing visitor and resource protection at Gateway and Golden Gate on the basis of their law enforcement training and performance. Park Rangers, however, are required to perform multiple roles, some of the more traditional of which are listed on pages 28 and 29. Law enforcement generally is not a primary function even for the commissioned rangers. To eliminate all but law enforcement from the duties and responsibilities, such as would be required in the designated urban areas of the Gateways would change the character of the position so dramatically that the designation of "Ranger" and all that that connotes, would become inappropriate. This, in our opinion, constitutes a fatal flaw in the report. Should our USPP be withdrawn from the Gateway areas, the law enforcement program would be carried out, not by "Rangers," but by some other designated classification title with an as now unknown GS salary and benefits (including retirement program) ranges.

See comment 5.

Assuming, for the sake of comments, that this would not be the case, and that "commissioned Park Rangers" could provide the level of law enforcement required on a full-time, 24 hour basis, the following is provided.

Since the creation of Gateway and Golden Gate in 1972, Park Rangers have made significant strides towards professionalism in their ability to carry out a law enforcement function. Although, the report indicates that Park Rangers had no formalized law enforcement training until 1976, it should be noted that as far back as 1970, many Park Rangers attended the same police training program presented to Park Police officers at the former Consolidated Law Enforcement Training Center in Washington, D.C. The level of required law enforcement capability then, as now, varied from park to park, depending upon specific complexity.

Now on p. 26.

On page 3 of the report, it is stated that the training received by commissioned Park Rangers is similar to that received by Park Police officers although the Park Police training is more extensive than that given to the Park Rangers (680 hours vs. 360 hours). This statement implies that the 360-hour basic training program presented to Park Rangers is at least equivalent to the 680-hour program presented to Park Police. It is true that both Park Police and commissioned permanent Park Rangers receive instruction in similar subject areas at the Federal Law Enforcement Training Center (FLETC), e.g. stress, investigation, officer safety, etc..., as shown in Table 2.1 on page 31. However, the report fails to consider the specific content of the individual courses presented to Park Police officers as compared to those courses presented to Park Rangers. On the surface, the courses appear similar. In reality, the courses presented to Park Police do require more time in order to provide more in-depth knowledge, skill, and understanding of specific subject matter.

See comment 6.

**Appendix I
Advance Comments From the Department of
the Interior**

Now on pp. 25 and 26.

On pages 29 and 30 of the report it is pointed out that a 9-week law enforcement curriculum was developed by FLETC in 1978. The purpose of this instruction is to provide basic police training for land management agency personnel such as the Bureau of Land Management, Forest Service, and the Park Service. It is important to note that the 9-week course mentioned above was developed based upon the law enforcement needs of several different agencies with diverse missions. The training program which resulted was not designed specifically to the law enforcement needs of Park Rangers but must accommodate those needs which coincide among the Bureau of Land Management, Forest Service and Park Service. This program does focus on many training issues that are also addressed in the Park Police program. However, this 9-week program does not adequately meet urban law enforcement requirements.

See comment 7.

It is well established that both Gateway and Golden Gate are urban parks with defined urban policing problems. Employee qualifications based upon training or experience similar to that of the Park Police is required to provide law enforcement personnel with the skills necessary for providing basic services at these urban parks.

Now on p. 26.

An important aspect of the Park Police basic training program is its Field Training Officer (FTO) program. The only references to this program in the report is a footnote on page 32. The footnote is also in error because the FTO program is 9 weeks in length (360+ hours) rather than 6 weeks. Hence, a total of 1,040 hours of training required for every new Park Policeman during his/her first year of employment.

See comment 8

The FTO program is a highly structured, formalized training program which assigns new Park Police officers with seasoned, experienced officers (FTO's). Under the guidance of the seasoned officers, new officers are given the opportunity to apply those skills and knowledges, which they learned at FLETC, in real-life situations. The law enforcement profession has become highly technical with a multitude of legal ramifications confronting all law enforcement agencies. Our Park Police FTO program is a means of ensuring that only those new police officers who demonstrate their ability to perform actual police work in actual real world situations are placed in police positions on a permanent basis. Through evaluations prepared on a weekly basis by FTO's, Park Police management can monitor new officer progress and recommend and design remedial training if necessary. New officers who are unable to perform police duties adequately at the conclusion of the FTO program and subsequent remedial training are removed from police positions.

Now on p. 26.

The importance of the FTO program is substantiated on page 32 of the report which reads, "All of the FLETC officials and instructors we spoke with noted that on-the-job training and annual refresher training are important factors in preparing law enforcement personnel for specific assignments."

**Appendix I
Advance Comments From the Department of
the Interior**

An analysis of the training programs of most major urban police departments, including those surrounding Gateway and Golden Gate, will reveal extensive use of some form of a FTO program. Police agencies have evaluated the extra costs associated with FTO programs and have concluded that the benefits far outweigh the expenses when legal issues such as tort claims, civil and criminal law suits, negligent training and retention, and vicarious liability are considered. Commissioned Park Rangers do not participate in an organized FTO type program.

Statement: "...the Park Service's Departmental and Agency Representatives told us that permanent Park Rangers (1) consistently attain some of the highest grades of FLETC graduates and (2) are highly motivated to perform law enforcement activities."

This is undoubtedly true. However, this statement is misleading or incomplete. Our Park Police officers also consistently attain some of the highest grades at FLETC, in a very rigorous program. Our officers are also highly motivated to perform law enforcement activities since they perceive their primary function as that of being a police officer. In contrast, for Park Rangers, law enforcement is a collateral duty as the report reflects on page 35.

On page 28, the report identifies some of the personal skills and job requirements expected of Park Ranger. As previously stated, the Park Ranger position is, indeed, a multifaceted one, encompassing more than full-time law enforcement programs.

Information on page 16 of the report is somewhat misleading since it implies that commissioned Park Rangers and Park Police share law enforcement duties and responsibilities throughout Gateway and Golden Gate. This is not the case. Park Rangers perform law enforcement duties only at the Sandy Hook Unit of Gateway and the Marin Headlands of Golden Gate. On page 36 of the report, this is somewhat clarified, but it should be emphasized that Park Rangers are responsible for law enforcement in the suburban or more rural areas of Marin and San Mateo Counties which comprise about 90 percent of Golden Gate. These Park Rangers are performing law enforcement as well as other traditional Park Ranger duties in those rural areas of Gateway and Golden Gate where analysis of criminal incidents have revealed that a full-time law enforcement program is not warranted.

An assumption made in the report is that "all of the Park Rangers needed for replacement [of Park Police officers at Gateway and Golden Gate] would be transferred from other park system locations throughout the country and replacement hiring, if any, would not be considered" (page 19). It is also stated on page 15 that approximately 2,100 of the 6,000 permanent Park Rangers have received law enforcement commissions as of

Now on p. 29.

See comment 9

Now on p. 24.

Now on p. 15.

Now on p. 29

See comment 10.

Now on pp 17 and 18

**Appendix I
Advance Comments From the Department of
the Interior**

January 1985. The 2,100 figure is somewhat inflated. In actuality, there are probably closer to 1,450 permanent Park Rangers with law enforcement commissions. To replace the 91 Park Police positions at Gateway and Golden Gate, commissioned permanent Park Rangers would have to be drawn from this pool of 1,450 Park Rangers. With severe shortages of personnel in the ranks of Park Rangers already occurring, an additional drain of 91 Park Rangers for Gateway and Golden Gate would severely impact Park Service operations throughout the country. Moreover, there is no basis for the assumption that the transferees would not be replaced. Rather, the assumption would be that they, in fact, would be replaced.

The report noted on page 19 that it did not compare Park Police and Park Ranger case closure rates because case closures may be determined by different criteria. However, it should be pointed out that case closure in general involves follow-up investigative type duties and responsibilities. These type duties and responsibilities are specifically curtailed for Park Rangers through the implementation, on August 2, 1985, of the National Park Service Director's "New Classification and Qualification Standards-Park Rangers Series, GS-025." Excluded from this series are positions that involve primarily: "Work in planning and conducting case investigations of persons or organizations that require application of full investigative knowledges, skills, techniques, and methods, and several days or extended periods of information collection, analysis, and evaluation for completion."

Table 2.3 on page 43 of the report reveals that Yosemite National Park recorded the highest number of Type I offenses in 1984. The report indicated that Yosemite is classified as an urban park and they stated that commissioned Park Rangers had demonstrated skill in law enforcement activities such as felony investigations. However, on page 44, the Chief Law Enforcement Ranger at Yosemite stated that he believes the average commissioned Park Ranger does not possess a comparable criminal investigative ability to that of a full-time law enforcement officer, such as the Park Police, because of the Ranger's lack of investigative experience.'

In addition, the above statement also implies that Park Rangers in general do not perform full-time law enforcement duties such as would be required at Gateway and Golden Gate.

Another significant exclusion from the Park Ranger Series, GS-025, are positions that involve primarily: "Law enforcement work in protecting life and property by maintaining law and order, preventing crime, detecting or investigating violations of law, preserving peace, and enforcing laws." Individuals who perform these types of duties should be classified under the Federal Police Series, GS-083.

See comment 11
Now on p. 17.

Now on p. 33.
See comment 12.

Now on p. 34.

See comment 13.

**Appendix I
Advance Comments From the Department of
the Interior**

Now on p. 17.

An assumption made on page 19 of the report is that 30 Park Police officers (15 from Gateway and 15 from Golden Gate) will be terminated and not reemployed by the Federal government. Although this assumption appears to be cost-saving benefit, many of the ramifications of attempting to implement this mass termination were not considered. For example, on page 65, it is assumed that the 30 lowest graded Park Police officers at Gateway and Golden Gate can be terminated. However, in accordance with the negotiated Labor-Management contract between the National Capital Region and the Police Association of the District of Columbia, only the 30 lowest graded Park Police officers throughout the Force could be terminated. Based upon seniority, less than 10 percent of the lowest graded officers are assigned to Gateway and Golden Gate. This would necessitate relocating the majority of the officers from Gateway and Golden Gate back to the Washington, D.C., area and terminating less senior officers currently employed in the National Capital Region. Also involved would be such issues as Veterans Preferences, and reemployment rights of terminated officers.

Now on p. 49.

See comment 14.
Now on p. 39.

Salary Table 2.4 provided by GAO on page 53 is accurate; however, it is somewhat misleading with regards to the salaries of Privates. Based upon 1984 salary rates, the career track for the majority of Park Police Privates can only reach a maximum salary of \$27,767. Private technicians have a maximum salary limitation of \$28,577 and represent only 21 percent and 14 percent of the Privates assigned to the San Francisco and New York Field Offices respectively. Privates assigned as pilots can reach \$30,037. There are no pilot positions located in either of the Gateways.

See comment 15.

Now on p. 49.

On page 65, the draft study identifies an additional expense of approximately \$69,000 for severance pay entitlements for the 30 officers we would be required to terminate. An additional immediate expense to the government resulting from the withdrawal of accumulated retirement contributions by those officers from the retirement system of approximately \$220,000 should be assumed. Additionally, the Federal Government would be responsible for subsequent unemployment compensation payments to these officers. Each of the officers terminated would be entitled to receive \$206 per week for a period of 26 weeks, or a total additional cost to the government of \$160,680.

See comment 16.

When the costs of non-collected retirement system contributions from these officers, and those factors cited above are considered, the additional expense of \$490,700 plus relocation costs could be incurred during the first year.

**Appendix I
Advance Comments From the Department of
the Interior**

Now on p. 48.

The draft study makes reference at various locations, but particularly on page 67, to "\$3.2 million in pension cost savings, and an additional \$40,000 to \$1.2 million in recurring pension accrual savings, depending on subsequent personnel actions," to be realized as a result of the termination of 30 officers from the ranks of our Park Police. Our analysis of the impact of terminating 30 officers on the funds status of our pension system reveals a minimum first year additional expense of \$260,000. This represents the amount of refunds from the pension system that would be due the officers who would be terminated including the amount of money that they would have contributed to the system had they continued in our employ for that year.

The report is correct in stating that on an accrual basis, "savings" will be attained by terminating these employees since they will, therefore, no longer be eligible for future retirement benefit payments from the pension system. However, it is important to emphasize that the first real dollar of such savings would not be realized for a minimum of 15 years. Further, during that 15+ year period, we estimate that the lack of contributions that these employees would have made to the system will result in an additional real dollar expenditure of approximately \$1,000,000. Therefore, while the termination of 30 of our officers would in the far future reduce the long term liability of the pension system, we do not see that any immediate savings would be realized, and in fact, wish to stress that this action would significantly increase outlays from our annual operating funds as is briefly mentioned on page 57 of the report.

Now on p. 43.

In appendix IV, the assertion is made that "EVALUATING THE COST OF PENSION PLAN ON THE BASIS OF SHORT-TERM CASH FLOW IS NOT MEANINGFUL." We disagree. Without denying that factors such as long term potential pension expense savings must be considered, we also believe that the short-term, ie., 1 to 15 years forward, must be equally considered. The retirement system, under which current Park Police officers retire, is somewhat unique, and is described earlier on in the draft study. However, appendix IV, which outlines the methodology utilized to compute the system's costs, addresses the "7 percent interest earnings on the trust fund." The Park Police pension system has no trust fund; it is a pay-as-you-go system and in our opinion must be analyzed as such.

See comment 17

In order to truly compare the present costs of our Park Police pension system against those of the proposed 91 person ranger force operation under provisions of the Civil Service Retirement System (CSRS), we believe it would be appropriate that the unfunded liability of CSRS be apportioned as a present year cost in the personnel services expenses of the proposed ranger force. This is what occurs each year for our police positions; the unfunded liability each year is apportioned to our police positions and shown as a personnel services expense. If for reason of analysis, it is deemed necessary to convert what amounts to the Park Police pension system unfunded liability to a year to year present value situation, then it is only reasonable to likewise include that portion of the CSRS unfunded liability on a prorated basis to each ranger position.

See comment 18

**Appendix I
Advance Comments From the Department of
the Interior**

See comment 19.

Now on p. 22.

There is discussion of the law enforcement authority of the Service in Chapter 2 of its report. Although most of the information is correct, there appears not to be a full understanding of the Deputy United States Marshal's status which has been conferred upon Park Police officers assigned to Gateway and Golden Gate. An example, it is stated on page 25 of the report that there is no difference between the arrest authority of a Park Police officer or commissioned Park Ranger has under 16 USC 1a-6(a). To the contrary, there are very explicit differences between the two arrest authorities. For example, with the Deputy United States Marshal's arrest authority, our Park Police officers are empowered to make arrests outside the parks in contiguous areas for offenses against the United States. During investigations, the arrest authority granted under Deputy United States Marshal's status is most advantageous. Legal authority granted under 16 USC 1a-6(a) on the other hand restricts arrest authority to areas within the National Park System.

In addition to Deputy United States Marshal's status, our Park Police officers assigned to Gateway and Golden Gate have been granted several state and local forms of "peace officer" status as noted on pages 25-26 of the report. The authority granted by this status is important because it allows the designated officers, on and off duty, to enforce state laws in that state and on those Federal lands that are of concurrent or proprietary jurisdiction, with prosecution available through the local court system.

A review of legislative history concerning peace officer status for Park Police officers assigned to Gateway (New York, New Jersey) and officers assigned to Golden Gate (Marin County, San Mateo County, San Francisco) reveals that this status is not easily obtained. Jurisdictions which grant this authority closely scrutinize all requests for peace officer status to ensure that law enforcement officers who apply for this status meet certain demanding criteria.

The process for our officers to obtain peace officer status was time-consuming and entailed extensive research and documentation. At present, our Rangers do not have peace officer status in any of the aforementioned areas. If commissioned Park Rangers assumed the duties of Park Police at Gateway and Golden Gate, peace officers status would be necessary. However, there are no assurances that the commissioned Rangers would be considered by the state and local governments to meet the criteria established by the above areas for obtaining the necessary peace officer status. In fact, San Francisco's Deputy Chief of Police, Field Operations Bureau, stated on August 12, 1985, in a letter to GAO, that "based on his knowledge that commissioned law enforcement rangers devote only 30-35 percent of their time to law enforcement . . . , he would conclude that San Francisco would be better served by continuing the assignment of Park Police officers at Golden Gate."

**Appendix I
Advance Comments From the Department of
the Interior**

Now on p. 23.

Without peace officer status, additional financial burdens will be placed on local law enforcement agencies surrounding Gateway and Golden Gate. As noted on page 26 of the report, the Commander of the New York City Police Department's (NYPD) 100th Precinct, expressed his concerns that NYPD officers would be required to assist in any arrests and prosecutions initiated by commissioned Rangers assigned to Gateway. This would drain NYPD's manpower resources, especially during periods of high visitation in Gateway, and would require Federal reimbursement to New York City to defray the expenses of providing increased NYPD support to the Park Rangers. San Francisco's Mayor Dianne Feinstein stated in her August 23, 1985, letter to GAO that "...any void in park police service which would require additional work by the San Francisco Police Department would necessitate my seeking reimbursement for our costs from the Federal government." With the Park Police performing full-time law enforcement at Gateway and Golden Gate, expenditures by New York City and San Francisco to assist the Park Police in carrying out their responsibilities is negligible. It is reasonable, therefore, to conclude that Federal funding would be necessary to supplement local jurisdictions in performing law enforcement.

There is a well founded concern as to the impact severity caused by recruitment and retention problems among Rangers (or other personnel) with law enforcement commissions. In 1985, in a study on the Federal Aviation Agency (FAA) Police Officers, GAO specifically addressed these issues. The study concluded that recruitment and retention problems severely impacted on FAA's budget and the services it provides. There are distinct pay similarities between the FAA Police Officers and our commissioned Park Rangers.

Now on p. 40.

Further, the report on page 54 states that, "...the Park Service has no current turnover studies or statistics that might indicate the severity of the pay comparability problem." However, in August 1985, the Chief Ranger, Independence National Historical Park, submitted a report entitled "Employee Turnover Update." This urban park, (Philadelphia, Pennsylvania), has 70 authorized Park Ranger positions assigned to patrol operations. Also, 5 overceiling positions were authorized to help alleviate the staffing problems being experienced at Independence. Since January 1, 1981, there have been 34 vacancies. Because of this high rate of employee turnover, Independence has been forced to consistently utilize these overceiling positions.

The Chief Ranger states, "The cost of this employee turnover is extremely high, not only to the Park, but to the Service in general." Impacts are:

- * A severely hampered protection program in the park.
- * Excessive overtime costs to maintain minimum safety levels.

**Appendix I
Advance Comments From the Department of
the Interior**

- * High administrative costs.
- * The loss of the value of over 150 weeks of training to the Service.
- * Decrease in morale.

Another significant study was conducted by Tammi Henderson of Appalachian State University. This study surveyed the graduates from the basic law enforcement program at the Federal Law Enforcement Training Center between 1979 and 1981. Her findings indicated that the highest attrition rate was at the GS-5 grade level. There were 92 GS-5's in the 1979/81 survey, 20 of whom have since left the National Park Service. This is a 23 percent turnover rate.

The contrast to the high employee turnover among our Park Rangers organization, our Park Police annual turnover rate is only 3.8 percent. We believe that it can be readily concluded, without further study, that the commissioned Rangers' inability to compete with salaries and benefits provided by local, state and Federal law enforcement agencies, would make a cost-effective transition in the workforce at Gateway and Golden Gate virtually impossible.

See comment 20.

The following are GAO's comments on the Assistant Secretary for Fish and Wildlife and Parks' letter dated January 15, 1986.

GAO Comments

1. The Department of the Interior implies that the law enforcement duties of commissioned Park Rangers' are "secondary" and/or "adjunct" to their traditional Ranger role. However, since the establishment of the Ranger "commissioning" program in 1977, the National Park Service has considered the commissioned Park Rangers' law enforcement duties and responsibilities as an equally important and integral part of the Rangers' services. In fact, at many of the parks we visited, including those in urban locations or with high visitations/crime rates, commissioned Park Rangers were required to devote as much as 95 percent of their time to law enforcement and related activities.

2. Although commissioned Park Rangers have been assigned to the more suburban and rural units of both gateway areas (as disclosed in our report), Interior's statement does not reflect that commissioned Park Rangers have been assigned the primary law enforcement duties and responsibilities throughout the park system, except at Gateway and Golden Gate. Many of these other park system areas, such as Chattahoochee River and Cuyahoga Valley National Recreation Areas, are also located in or near heavily concentrated urban centers. It appears, therefore, that the Park Service has demonstrated its confidence in the law enforcement capabilities of its commissioned Park Rangers by assigning the primary law enforcement responsibilities and duties of the Park Service to them.

3. Interior's comment implies that we have concluded that replacement commissioned Park Rangers can provide a 100-percent level of law enforcement and still provide all of the other services normally associated with Park Rangers. This is incorrect. Our report conclusion, instead, recognizes that although Park Rangers' skills are more diverse than those of Park Police, it may not be possible for Park Rangers to provide additional visitor services if they are performing law enforcement as their major duty, especially during high visitation periods.

4. We agree with Interior that replacing Park Police with commissioned Park Rangers could have serious consequences that were not directly addressed by our report (although major Park Service and Park Police concerns were disclosed in the report) because they were outside the scope of our review. Our cognizance of their potential importance is the basis of our report recommendaton that Interior should assess these

consequences for decisionmaking purposes, rather than effect a replacement on the basis of cost factors alone.

5. As noted in response 3, we recognized the possible consequences of replacing the Park Police on a one-for-one basis with Park Rangers. The report noted that “. . . utilizing commissioned Park Rangers diverse abilities . . . may be severely limited . . .” and that “. . . providing the same law enforcement coverage with a similar number of Park Rangers . . . would limit their activities to law enforcement.” We also recognize, on page 48 of the report, that if commissioned Park Rangers become full-time law enforcement officers, their positions might be reclassified and they could become eligible for retirement benefits similar to those of the Park Police.

6. We have clarified the statement on page 3 of the report by changing “Park Police and commissioned permanent Park Rangers receive similar training in areas . . .” to “Park Police and commissioned permanent Park Rangers receive training in similar areas . . .” We recognized in table 2.1 on page 26 of the report that the Park Police received more extensive training in 8 of the 10 basic training areas than did the Park Rangers. Information on page 26 of the report also recognizes FLETC’s practice of not segregating its training courses by the student’s employing organization. Park Police and Park Rangers attend many of the courses together, which is also common practice during in-service training at Golden Gate. Park Service officials agreed that the daily law enforcement performance of commissioned Park Rangers has proven that they are capable of providing visitor and resource protection services at any Park Service area.

7. We disagree. Although the Park Police do receive a greater number of basic training hours at FLETC (as we noted on pp. 3, 24 and 26 of the report) then do the Park Rangers, we found no evidence that, as a result, the Park Rangers were disadvantaged in performing their law enforcement duties or in providing adequate police services at either Gateway or Golden Gate or at any of the other urban and heavily visited park areas that we visited. We noted on pages 26 through 28 of the report that commissioned permanent Park Rangers received a greater number of in-service training hours at both gateway areas and many had also accumulated extensive law enforcement training and experience as commissioned seasonal Park Rangers prior to their basic training at FLETC.

8. The footnote on page 26 of the report has been changed from “. . . 6-week . . .” to “. . . 9-week . . .” in response to Interior’s comment.

9. We disagree that the subject statement on page 27 is misleading or incomplete. To determine if commissioned Park Rangers could capably replace the Park Police at Gateway and Golden Gate, we evaluated several demonstrated Park Ranger training and performance proficiency factors. The subject statement is a factual representation of one of these performance factors. Conversely, the law enforcement abilities of the Park Police were not in question and, therefore, are not addressed in this report.

Although law enforcement is a collateral duty of commissioned Park Rangers as the Interior statement notes, we do not agree with the statement's implication that Park Rangers are not as highly motivated in the performance of their law enforcement duties as are the Park Police. Our report, for example, noted that the Park Ranger commissioning program is strictly voluntary and that Rangers receive no additional compensation for obtaining a commission. Discussions with training and supervisory officials also indicated that, like the Park Police, commissioned Park Rangers are highly motivated to perform law enforcement.

10. We believe the information contained in our report is a factual presentation of the number of Park Police and commissioned Park Rangers assigned to the respective gateway parks. As Interior's comment states, the law enforcement coverage provided by the Park Police and commissioned Park Rangers at both gateway areas is specifically identified in the report, and a lengthy description of each gateway unit area is provided in appendix II.

11. Interior provides no evidence to support its position that ". . . there are probably closer to 1,450 permanent Park Rangers with law enforcement commissions . . ." rather than the 2,100 figure reported to us by the Park Service. Also, as we note in response 14 below, our review assumptions were discussed and agreed to beforehand with Park Service officials.

12. Interior's comment is incorrect. Our report does not classify Yosemite National Park as an urban park. Appendix III lists the urban parks we visited, and the list does not include Yosemite.

13. Interior's comment highlights one Ranger's statement made in contradiction to the general opinion of Park Service officials. Park officials at both gateways and the nine other parks we visited generally agreed that commissioned permanent Park Rangers are not only capable of performing all of the duties normally required in visitor protection services

but they have also demonstrated their law enforcement skills during their daily activities, including felony investigations as one of several examples.

14. Our review assumptions were discussed and agreed upon beforehand with Gateway, Golden Gate, and Park Service and Park Police headquarters' officials. Park Service and Park Police officials agreed that a reliable estimated cost savings, resulting from the termination of 30 Park Police officers, could be determined by using the 15 least senior officers from each gateway. Park Police officials recommended this estimation method in order to avoid raising the apprehensions of the officers throughout the force that they believed would have resulted if individual officers were identified as the result of a more specific termination analysis.

15. Interior's comment noted that the highest salary that a Park Police private, other than a pilot, could have received in fiscal year 1984 was \$27,767 or \$28,577 (for technicians) instead of the \$30,037 as indicated by table 2.4. We have added a footnote to table 2.4 that recognizes this salary limit. These nonpilot salary levels would have been \$9,781 and \$10,591 more, respectively, than the highest fiscal year 1984 Park Ranger salary of \$17,986. We believe that the comparison of the above Park Police and Park Ranger salary levels supports the concerns of the Park Service's Associate Director for Park Operations and other Park Service officials regarding possible problems in attracting and retaining replacement commissioned Park Rangers to the high cost-of-living area of both parks.

16. Interior suggests that we should have included the return of past employee contributions and the loss of future employee contributions for the 30 Park Police positions that might be terminated as a result of replacement. This is incorrect. Both items were included in our estimated pension plan net savings of present value of \$3.2 million resulting from the termination of the 30 positions. The components of our \$3.2 million estimate are shown in table I.1.

Table I.1: Components of Park Police Termination Cost Estimate

Methodology	Cost
Present value (at 7 percent) of benefits if the 30 Park Police positions continue in the system (this includes benefits accrued as well as benefits to be accrued in the future)	\$8.6 million
Less: Present value of future employer pension accruals if they continue (subtracted out because it has already been considered in the savings in annual pension accruals of \$40,000 to \$1.2 million)	-4.5 million
Less: Present value of future employee contributions if they continue	-0.6 million
Less: Amount of accumulated employee contributions returned to terminated employees	-0.3 million
Net savings from terminating future benefits	\$3.2 million

We agree that the federal government would be responsible for unemployment compensation payments to state agencies that would administer the unemployment payments to the terminated officers. Interior suggests that \$160,680 would be the total cost of this additional expense. We believe, because of the number of cost variables, including the individual states' unemployment compensation formulas and the actual length of the individual's unemployment period, that a specific cost cannot be determined with any degree of confidence. However, we have acknowledged the Interior-identified cost where appropriate in the report.

17. Interior criticizes our report because we compare the annual accrued pension costs of Park Rangers and Park Police rather than comparing the short-term budget outlays. Our comparison method, however, is consistent with the policy for cost comparisons outlined in OMB Circular A-76. This circular relates to comparisons of the cost of providing a service using government employees as opposed to contracting for the service. It provides that the full accrual cost of pensions to government employees should be considered, not just the 7 percent of salary paid by the government agency from its annual appropriation. The same principle applies to comparisons of the cost of providing services using two different groups of government employees.

We agree that the replacement of Park Police with Park Rangers would result in additional cash outlays for pensions over the next few years. This difference arises because the Civil Service Retirement System is funded differently than the Park Police pension system. Park Police pensions are funded on a pay-as-you-go basis (except for the 7-percent employee contributions), which shifts the costs for services provided now to future generations of taxpayers. The Civil Service Retirement System has a fund that receives agency, employee, and Treasury

Department contributions for present and future pension program costs. A comparison of cash flows would demonstrate the difference in funding philosophy, not the difference in the cost of pensions. We noted on pages 42 and 43 of the report that the pension system for the Park Police is considerably more costly than the Civil Service Retirement System. Park Police pension benefits begin sooner and are a higher percentage of salary for each year worked than are Park Ranger pension benefits.

18. Interior suggests that we should apportion the unfunded liability of the Civil Service Retirement System to the cost of the proposed 91 Park Ranger replacement positions. We disagree. The unfunded liability of the Civil Service Retirement System has arisen because of employee service in the past. Whether the Park Rangers replace the Park Police or not, there would be no effect on the unfunded liability in either pension plan for employees who were either newly hired or who transferred to new positions. Instead, the unfunded liability of the Park Police pension plans for officers terminated before reaching retirement age (the \$3.2 million noted on page 67 and 68) would be reduced.

19. Additional information regarding the arrest authority of Deputy U.S. Marshals in the contiguous areas outside of the parks has been included in chapter 2.

20. Interior's comment contradicts the statement made in the second paragraph of Interior's cover letter, which reads "We have no problem with the recommendation in the report, and the additional information (that would be developed in response to the recommendation). . . would be beneficial." We recognized on page 39 of the report the salary disparity between Park Police and commissioned Park Rangers that should be considered in the Interior study.

Description of Gateway and Golden Gate National Recreation Areas

Gateway National Recreation Area

Four management units have been designated within the Gateway area boundary, which correspond to the geographically separated land areas joined by lower New York Bay and peripheral waters. Managers under the direct authority of the park superintendent administer these units. Overall responsibility for Gateway management lies with the park superintendent.

Sandy Hook

The Sandy Hook unit is located on a peninsula at the northern end of New Jersey's Atlantic shoreline just north of the town of Atlantic Highlands, New Jersey. It includes about 7.5 miles of ocean beaches and sheltered bayside coves; hundreds of acres of ecologically significant barrier-beach vegetation; and at the northern end the lands, facilities, and fortifications of the Fort Hancock complex. The U.S. Coast Guard and U.S. Army Corps of Engineers maintain properties at the Sandy Hook tip that are excluded from the park. The Coast Guard also holds two small properties within Fort Hancock, one of which contains the historic Sandy Hook Lighthouse.

A wide variety of recreational uses currently take place in the Sandy Hook unit. The South Beach area continues to be used in traditional fashion—for all types of beach activities—and the North Beach bathing area is available for limited public use. Picnicking and fishing are popular on the bay side of the Sandy Hook neck. Environmental education programs and casual nature study occur in the marsh/grassland communities near a reservation basin.

Staten Island

The Staten Island unit, extending along the southeastern shore of Staten Island, includes (from south to north) Great Kills Park, New Dorp and Oakwood Beaches, Miller Field; Midland and South Beaches, historic Fort Wadsworth; and two small man-made islands, Hoffman and Swinburne, lying just offshore.

Great Kills Park

Great Kills Park has several major areas for observing migrating birds and monarch butterflies. Crookes Point in particular provides cover and habitat for migrating as well as resident species. Miller Field contains a small swamp white-oak forest that is locally unique and valuable for environmental education. Back-beach areas at Oakwood/New Dorp and points along the beach north of Miller Field are also important habitats. Most portions of the Staten Island unit have been previously developed, either as city parklands or as military sites. Great Kills, initially a salt

Appendix II
Description of Gateway and Golden Gate
National Recreation Areas

marsh and later a landfill, was developed as a city park over 20 years ago and today offers a wide spectrum of recreational facilities along its beach, interior, and harbor. Fronting the beach are a concession stand and bathhouse complex with a full range of support facilities, including two paved parking lots.

New Dorp and Oakwood Beaches

New Dorp and Oakwood Beaches connect Great Kills and Miller Field. Together, they contain over 1.25 miles of ocean beach and back-beach areas. Miller Field, a former Army air base, is the site of the Staten Island unit headquarters and the recreational hub of the surrounding communities.

Miller Field

Miller Field is heavily used by local residents for a variety of outdoor sports and other active recreational pursuits. Environmental education groups frequently visit the swamp white-oak forest. Present park uses in those portions of the Staten Island unit that are open to the public follow patterns already well established when the National Park Service assumed management. The areas that are now administered by the Park Service—Great Kills and Miller Field—have witnessed increasing numbers of visitors since 1972, but use patterns and activities have remained largely the same. Because Great Kills is the only area along this segment of the Staten Island shore where the offshore waters are suitable for swimming, this and other water activities represent the primary use of the park. Areas surrounding and northwest of the Great Kills bathhouse are used for unstructured recreational pursuits like picnicking and exploring, and environmental education classes and groups visit the portion of the park northeast of the bathhouse complex.

Midland and South Beaches

The majority of shore frontage at Midland and South Beaches is protected by New York City lifeguards, and a variety of activities take place there, although swimming, surfing, and other water-contact sports are not allowed because of pollution. Both structured and unstructured activities occur in back-beach areas of Midland/South Beaches, including court and field games, surfing, strolling, and picnicking.

Breezy Point

The Breezy Point unit lies south of Jamaica Bay on the western end of the Rockaway peninsula and contains 4.5 miles of ocean beaches. Included in this unit are the popular Jacob Riis Park and most of the lands and facilities within the Fort Tilden military complex. At the

western end—the Tip area—are some 200 acres of sand dunes, salt marshes, brackish marshes, and grasslands that are in a relatively undisturbed condition.

Most lands at Breezy Point still remain in other than public park uses, generally under permit from the National Park Service. Only Jacob Riis Park and adjacent areas of Fort Tilden are now heavily used by the public for recreation—a visitation rate of as many as 90,000 visitors per day has occurred during the summer months. Riis Park is primarily a beach facility, although structured recreational activities such as court and field games take place. Picnicking is also popular at sites more distant from the beach.

Fort Tilden receives much less public use. The beach and back-beach areas adjacent to the Jacob Riis facility have the largest number of visitors. Fort Tilden is the site of the Breezy Point unit headquarters.

Little activity takes place in the rest of the unit.

Jacob Riis Park

The major attraction at Breezy Point is Jacob Riis Park, located in the eastern part of the unit just south of the Marine Parkway Bridge. Riis Park was initially established by the city of New York in the 1930's. It features a mile of ocean beach and a highly developed back-beach area. Divided by wooden pilings and rock jetties into 14 bays, the beach is equipped with 15 lifeguard stations. In the back-beach area is a concrete boardwalk extending the full length of the beach, with several conveniently placed concession stands. Centrally located is a prominent bathhouse, which provides shower and locker facilities and related support services. The bathhouse is flanked on both sides by paddle-tennis and handball courts, ballfields, and tot lots; the entry mall area houses a variety of food concessions, recreational open spaces, and shuffleboard facilities. Completing this intensely developed area is an 18-hole pitch-and-putt golf course. The entire Jacob Riis facility is considered a significant historic resource representative of public park development in this country.

Fort Tilden

The Fort Tilden site, a long-established Army post adjacent to Jacob Riis Park, possesses a mixture of quasi-natural areas and assorted military structures from several historic periods. A narrow, 1 mile-long beach stretches in front of the fort complex, backed by a narrow primary dune system. The western portion of the Fort Tilden area contains the best

developed and least disturbed natural areas, as well as deserted and deteriorating bunkers, missile sites, radar installations, and Army support structures; the latter features constitute a valuable historic resource for interpreting the nation's coastal defense system. The narrow eroding beach and the steep offshore slope in this area create hazardous conditions in adjacent waters, making them unsuitable for swimming. The eastern core contains few natural areas (a small deciduous forest community is located on the boundary with Riis Park) but has a large collection of structurally unsound facilities, including barracks, recreation buildings, a theater, and storage structures. Existing beach facilities south of this core area were all previously abandoned and are now in varying stages of disrepair or temporary rehabilitation.

Jamaica Bay

The Jamaica Bay unit is comprised primarily of marshland in and near Jamaica Bay. This unit has been further subdivided as follows.

**Floyd Bennett Field/Plumb Beach/
Bergen Beach**

This area contains open space and facilities of the former naval air base on Floyd Bennett Field as well as nearby shorelands at Dead Horse Bay, Plumb Beach, and Bergen Beach.

Development at Floyd Bennett Field is extensive. Historically a civil aviation facility, it is dominated by construction and man-altered landscapes. The portion of Floyd Bennett that has been transferred to the National Park Service features a concrete runway grid, six large hangar complexes, and numerous administrative and air-base support facilities. Major development, situated to support the air base, consists of the partially abandoned military structures and the grid of massive concrete runways.

Although open to the public on a limited basis, Floyd Bennett Field receives little recreational use. Special events, activities by permit, and environmental education programs comprise the majority of use. Renovated structures in this area serve as headquarters for Gateway, the Jamaica Bay unit, and the Park Police.

North Shore

Gateway lands along the north shore of Jamaica Bay include the developed parks at Canarsie Pier and Frank Charles and Hamilton Beach Parks, the undeveloped lands at Spring Creek Park, and the active land-fill sites at Pennsylvania and Fountain Avenues.

Development at Canarsie Pier includes the pier itself, a large parking lot, a promenade, a structure housing maintenance and storage facility, a concession stand, and public toilets. The area surrounding the pier is maintained in grass; salt marshes extend along the bay fringe on both sides.

Frank Charles and Hamilton Beach Parks include maintained areas bordered by fringe salt marshes. Facilities include playgrounds, ball fields, tennis courts, and picnic grounds.

The Spring Creek Park area has no significant development at the present time. The site contains an extensive marsh system.

Only the developed parklands at Canarsie Pier and Frank Charles and Hamilton Beach Parks are open for public park use. These areas primarily serve the recreational needs of nearby community residents.

Wildlife Refuge

This Gateway area includes the lands, marshlands, and other habitats of the Jamaica Bay Wildlife Refuge as well as some of the other islands in Jamaica Bay.

The core of the Jamaica Bay Wildlife Refuge development, and its operational headquarters, is situated in the approximate center of the bay. Recreational uses of the wildlife refuge are limited to the visitor center/West Pond vicinity and the larger islands (Canarsie Pol, Ruffle Bar, and Little Egg Marsh), which are visited by fishermen and picnickers in boats. Fishing is also popular along and at the south end of North Channel Bridge. The remainder of the wildlife refuge core is under protected status or is available for nature study on a permit basis. Most of the other Jamaica Bay islands are used for fishing, clamming, and baiting.

Golden Gate National Recreation Area

Three management units have been designated within the Golden Gate area boundaries—the San Francisco unit, the Maritime unit, and the Marin unit. These units are administered by managers who are under the direct authority of the park superintendent, who also has the overall responsibility for all activities within the park.

The San Francisco Unit

This unit is comprised of Fort Point, the Alcatraz District, the Ocean District, the Bay District, and Sweeny Ridge.

Appendix II
Description of Gateway and Golden Gate
National Recreation Areas

Fort Point

Fort Point, constructed over 120 years ago by the U.S. Army, stands under the Golden Gate Bridge. It is a classic example of a brick seacoast fort built to protect a harbor. Built between 1853 and 1861 to prevent hostile fleets from entering San Francisco Bay, the fort was designed to mount 126 cannons and house 600 soldiers.

The fort was abandoned in 1886, when more powerful cannons made brick forts such as this obsolete. From 1933 to 1937, the fort was used as a base of operations during the building of the Golden Gate Bridge. During World War II, the fort was garrisoned by about 100 soldiers, with manned search-lights and rapid-fire cannons to protect a submarine net stretched across the entrance to San Francisco Bay. Declared the Fort Point National Historic site by the Congress in 1970, guided tours of the fort are given by Park Rangers.

Alcatraz District

The name of this small island in the middle of San Francisco Bay comes from the Spanish “La Isla de las Alcatrazes,” or the “Island of the Pelicans.” Originally, a lighthouse, military barracks, and batteries were constructed on Alcatraz. At various times since 1859, the island has been used to house prisoners—including Civil War, American Indian, and World War I prisoners. In 1934 it was converted into a maximum security federal penitentiary for the likes of Al Capone, “Machinegun” Kelly, and Robert Stroud—the “Birdman of Alcatraz.” After 29 years the federal prison closed and the island was inactive for 6 years until a group of American Indians occupied it from November 1969 to June 1971.

Swimming, surfing, fishing, and boating are water activities visitors enjoy at the district’s three beaches—Baker, China, and Ocean. Baker and China beaches are open during daylight hours, and the 4 miles of Ocean Beach never close. The annual Bay to Breakers foot race, which ends at Ocean beach, attracts about 200,000 people.

Bay District

Fort Mason provides a quiet setting with views of the city and bay. Golden Gate headquarters is located here. Lawns, gardens, fishing pier, and picnic areas are available for visitor enjoyment.

Sweeney Ridge

Sweeney Ridge consists of 1,047 acres and is located in Pacifica, San Mateo County. The area is bordered on the north by Sharp Park and on the south and east by San Francisco watershed lands. The ridge is

believed to contain the site from which the Portola expedition first viewed San Francisco Bay in 1769. The undeveloped character of the surrounding hills provide an appropriate setting for the interpretation of this historic event.

Acquired in December of 1980, this ridge was a recent addition to Golden Gate. The slopes are covered with coastal scrub vegetation. The area is used by hikers and off-road vehicles.

The Maritime Unit

Included in this unit is Aquatic Park, six historic ships at the Hyde Street Pier, the Balchutha, and the Maritime Museum.

Aquatic Park is one of the Maritime unit's most popular as well as most urban recreational areas in Golden Gate. The intensive waterfront development of the Fisherman's Wharf area, including Ghirardelli Square and the Cannery, adjoins the unit on its south and east sides. The green slopes of Fort Mason define its western limits. Within the park, the crescent-shaped Municipal Pier is a popular fishing spot and a good place for walkers to gain a unique view of the city and the bay. The Hyde Street Pier at the east side of the unit provides berthing space for historic ships, which are a major asset to the waterfront scene. The bay waters enclosed by these two piers create a quiet lagoon used frequently by the swimmers and rowers headquartered in the three private clubs lining the shoreline adjacent to the foot of the Hyde Street Pier.

Hyde Street Pier Ships

The historic ships berthed at the Hyde Street Pier are from different eras of maritime commerce. Two of the ships can be boarded—the commuter-ferry Eureka, and the schooner C.A. Thayer. The others are the hay-scow Alma, the ocean-going tug Hercules, the double side-lever engine river tug Eppleton Hall, and the steamer Wapama.

The Balchutha

The Balchutha is a square-rigged Cape Horn sailing ship built in 1886.

The Maritime Museum

Constructed in 1939 the museum, which is the West Coast's largest maritime museum, covers many years of seafaring history. Parts of old San Francisco Bay vessels, ship models, artifacts, and over 100,000 photographs of sailing ships, ports, and the ever-changing San Francisco waterfront are available for viewing.

The Marin Unit

This unit is comprised of the Marin Headlands and the Tamalpais District.

Marin Headlands

Across the Golden Gate Bridge from San Francisco lies the Marin headlands, which include windswept ridges, and protected valleys and beaches. Visitors can enjoy magnificent views of the San Francisco harbor entrance from its hillsides.

Tamalpais District

This district extends from California State Highway 1 in Tamalpais Valley and Muir Beach on the south to Bolinas-Fairfax road on the northern end, including Muir Woods National Monument, and the former Mill Valley Air Force Station. The district includes 7 miles of Pacific Ocean shoreline and two popular day use beach areas. The district is not contiguous because of the communities of Stinson Beach and Muir Beach, Mount Tamalpais State Park, and the Audubon Canyon Ranch, all of which are within the boundaries of the recreation area, but not under Golden Gate jurisdiction. The area is traversed by State Route 1, Panoramic Highway, and Franks Valley Road.

The district's diversity is reflected in the variety of visitors to the area, ranging from predominately teenage and young adult crowds at Stinson Beach to national and international visitors at Muir Woods National Monument, and the more independent hikers, bird watchers, and fishermen who frequent the more remote areas of the district.

Muir Woods National Monument

Located 17 miles north of San Francisco, this giant redwood sequoia grove covers 550 acres, including 6 miles of trails. Muir Woods is a popular visitor site all year around.

The area has a variety of animal life supported by rich plant growth, a plentiful water supply, and many breeding sites. Among the animals found in the woods are blacktail deer, western gray squirrels, Sonoma chipmonks, raccoons, and skunks. The woods also have a wide variety of birds as well as some harmless varieties of snakes, lizards, and salamanders.

Some of the coast redwoods located here exceed 240 feet in height. Their usual life span ranges from 400 to 800 years. Hikers enjoy the trailside exhibits and picnic facilities provided at nearby park areas.

Locations Visited/Contacted

National Park Service Office Locations

Park Service Headquarters, Washington, D.C.
 North Atlantic Regional Office, Boston, Mass.
 Southeast Regional Office, Atlanta, Ga.
 Southwest Regional Office, Santa Fe, N. Mex.
 Western Regional Office, San Francisco, Calif.

National Park System Urban Areas¹

Chattahoochee River National Recreation Area, Ga.
 Cuyahoga Valley National Recreation Area, Ohio
 Gateway National Recreation Area, N.Y.
 Golden Gate National Recreation Area, Calif.
 Jean Lafitte National Historical Park and Preserve, La.
 Santa Monica Mountains National Recreation Area, Calif.

Other National Park System Areas²

Biscayne National Park, Fla.
 Everglades National Park, Fla.
 Lake Mead National Recreation Area, Nev.
 Point Reyes National Seashore, Calif.
 Yosemite National Park, Calif.

Federal Agencies

Federal Law Enforcement Training Center, Glynco, Ga.
 U.S. Army, Presidio of San Francisco, Military Police, San Francisco, Calif.
 U.S. Coast Guard, Miami, Fla.
 U.S. District Attorney's Office, Fresno, Calif.

State and Local Agencies

Collier County Sheriff's Office, Naples, Fla.
 Dade County Sheriff's Office, Miami, Fla.
 East Bay Regional Park District, Department of Public Safety, Castro Valley, Calif.
 Florida Marine Patrol, Miami, Fla.
 Jefferson Parish Sheriff's Office, New Orleans, La.
 Las Vegas Metropolitan Police Department, Las Vegas, Nev.
 Madera County Sheriff's Office, Madera, Calif.
 Marin County Sheriff's Office, San Rafael, Calif.

¹Subcommittee staff suggested that we visit these other comparative parks in the National Park System because of their visitor similarities to Gateway and Golden Gate.

²Park Service officials identified these sites as providing a good basis for evaluating the law enforcement capabilities of Park Rangers.

Appendix III
Locations Visited/Contacted

Mariposa County Sheriff's Office, Mariposa, Calif.
Middletown Police Department, Middletown, N.J.
Mohave County Sheriff's Office, Kingman, Ariz.
Monroe County Sheriff's Office, Tadmor, Fla.
New Jersey State Police, Colts Neck, N.J.
New York City Police Department, New York City, N.Y.
San Francisco Police Department, San Francisco, Calif.
San Mateo County Sheriff's Office, San Mateo, Calif.
St. Bernard Parish Sheriff's Office, New Orleans, La.
Ventura County Sheriff's Department, Simi Valley, Calif.

Pension Costs for Park Police and Park Rangers

The pension plan for the Park Police (the D.C. Police and Firefighters' Retirement Plan) is more costly than the Civil Service pension plan for Park Rangers hired before 1984. Park Police officers can retire with 20 years of service at any age, and their benefits will be a higher percentage of average salary for each year of service than that of Park Rangers, whose pension is the standard Civil Service retirement benefit.

Unlike salary costs, annual pension costs must be compared on an accrual basis because of differences in funding practices. The Park Police's pension plan is funded on a pay-as-you-go basis. This means that no pension cost is recognized or paid by the Park Police during the careers of the officers. The Park Police reimburses the pension plan for payments to retirees as they are made.

On the other hand, Park Rangers are covered by the Civil Service retirement system. The Park Service pays 7 percent of the Rangers' basic salaries to the retirement system each year. In addition, the Department of the Treasury makes annual amortization payments to make up, over a period of time, the difference between the normal cost of the retirement system¹ and the total 14 percent contributed by both the Park Rangers and the Park Service. The Treasury is also paying for past accruals that were not funded or not fully funded.

Evaluating the Cost of Pension Plan on the Basis of Short-Term Cash Flow Is Not Meaningful

Pension costs involve long-term commitments extending decades into the future. Because of this, it is not meaningful to evaluate the cost of a pension plan on the basis of short-term cash flow. The pension cost accrual rates spread the costs uniformly throughout the participants' working careers and thus better reflect the long-term nature of these costs.

To illustrate why it is not meaningful to compare the cash flow of pension costs for Park Police officers with that for Park Rangers, consider a 30-year old employee earning \$15,000 per year after 5 years of service under each pension plan. If the employee is a Park Ranger, the Ranger and the Park Service will each contribute \$1,050 during the year (7 percent x \$15,000) to the civil service retirement system. These 7-percent

¹The normal cost of a retirement system is usually defined as the level percentage of career salaries of a group of typical new entrants necessary to pay all of the benefits for the group. In other words, the government and the employees must make combined contributions of the normal cost percentage multiplied by the gross pay of each employee (excluding overtime pay and other bonuses and differentials) to the pension plan. These contributions plus the interest credited by the Treasury to the pension trust fund each year will accumulate to an amount sufficient to pay the retirement, disability, termination, and death benefits of the employees.

contributions by the Park Service and the Ranger are not sufficient to pay for the anticipated future benefits of the Park Ranger. The most recent estimate by the Office of Personnel Management is that Civil Service retirement plan benefits cost 35 percent of salary (the normal cost of the plan). The Treasury must make up the 21-percent difference between the 35-percent normal cost of the pension plan and the 14 percent contributed by the employee and the Park Service.

On the other hand, the Park Police officer will contribute \$1,050 during the year, but the Park Police will contribute nothing. This pattern will continue until the officer retires at least 15 years from now. After the officer's retirement, the Park Police will pay the annual retirement benefits from their annual appropriations until the officer or surviving spouse dies.

Net Normal Costs to Government Must Be Considered to Analyze Pension Costs in a Comparable Manner

In order to analyze pension costs in a comparable manner, it is necessary to compare the net normal costs to the government as a level percentage of career salaries. The net normal cost to the government of a federal pension plan is the normal cost minus the 7-percent employee contribution. The most recent estimate by the Board of the D.C. Police and Firefighters Pension Plan is that pension plan benefits for Park Police officers cost 61 percent of salary (the normal cost of the plan). Thus, the net normal cost to the government of pension benefits for Park Police officers is 54 percent (61 percent normal cost minus 7-percent employee contribution) compared with 28 percent (35 percent normal cost minus 7-percent employee contribution for Park Rangers). This substantial difference in net normal cost rates is based on estimates using similar assumptions about future salary increases, interest rates, and post-retirement benefit increases.

In order to estimate the effect on pension costs of switching from Park Police to Park Ranger positions, questions regarding how a possible replacement could be accomplished need to be considered, including the following:

- Would the Park Service hire 91 new Rangers to fill the slots vacated by Rangers transferring to the new positions, or would the Park Service be able to eliminate some or all of the positions being vacated by transferring Rangers?
- Would 50 additional Park Police positions be added in Washington, D.C., if there were no transfer of field positions to the Park Service, or would these 50 positions be added solely to ease the financial burden on the

affected Park Police officers? If the latter is true, would these excess positions be gradually eliminated through a hiring freeze and attrition?

If it is assumed that 91 new Rangers will be hired as a result of the transfer of positions, an estimate of the net normal cost of the Civil Service Retirement Plan is needed. Any federal employee hired since the end of 1983 will be covered by Social Security and a Civil Service pension plan that has not yet been created. Since it is not now known what the provisions of this plan will be, we cannot make a firm estimate of the net normal cost of the plan. However, the Congressional Research Service (CRS) has estimated the net normal cost of the new pension plan proposed by the Senate. CRS estimates that if the Senate plan is enacted, the net normal cost to the government will be 21.9 percent of salaries. We have used CRS' estimate in our calculations.

The estimated ongoing savings in annual pension accrual (not cash) costs at 1984 salary levels would be between \$40,000 and \$1.2 million, depending on how the Park Police and Park Service would adjust their personnel positions. (See tables 1 and 2 in this appendix.) There would be an additional effect on pensions from a decision to switch to commissioned Park Rangers. The Park Police would experience a gain of a present value² of \$3.2 million as a result of terminating the pension entitlement of the 30 Park Police officers with the lowest salaries. The amount of this gain is dependent upon none of the 30 officers' returning to federal service. If any or all of the 30 officers are able to return to the Park Police or other federal employment, then this part of the savings will be reduced or eliminated.

To illustrate how this savings arises, consider a 30-year-old Park Police officer with 5 years of service. If the officer continues service and retires at the earliest possible date, he/she will collect retirement benefits from age 45 until either his/her death or the death of the officer's surviving spouse. These benefits will be partially paid by the officer's contributions of 7 percent of his/her salary from the ages of 25 to 45. The balance of the officer's benefits will be paid by Park Police appropriated funds. If involuntarily terminated at age 30, the officer collects a lump sum of the accumulated amount of his/her 7-percent contributions without interest from ages 25 to 30.

²The present value (1984) of a future payment represents the amount that would have to be placed in a fund earning a given rate of interest to accumulate to the payment amount on the date of payment.

**Appendix IV
Pension Costs for Park Police And
Park Rangers**

The decision to terminate the officer in this illustration would result in the following change in cash flows:

Table IV.1: Change in Cash Flows

Outlays eliminated by the decision	Outlays created by the decision
Pension benefits from age 45 to death (less: employee's contributions from ages 30 to 45)	Return of employee's contributions from ages 25 to 30

If the elements of this formula are converted to present values, the result is the net savings to the government as a result of terminating the pension entitlement of this employee.

Future pension accruals would have provided part of this officer's future benefits, and are reflected in his/her pension benefits from age 45 to death. Thus, to avoid counting the Park Police net normal cost accruals twice as savings, we have subtracted them from the formula above. This adjustment left us with the following formula for calculating the savings from terminating the pension entitlement of the employee, over and above the recurring annual pension accrual savings from eliminating his/her position:

Present value of savings	= Present value of pension benefits from ages 45 to death
	- Present value of employee's contributions from ages 30 to 45
	- Present value of employer's net normal cost pension accruals from ages 30 to 45
	- Return of employee's contributions from ages 25 to 30

In order to estimate the present value of the savings from terminating the pension entitlement of 30 Park Police officers, we applied this formula to the 30 officers with the lowest salaries as of September 30, 1984. We constructed a computer model to simulate the operation of the D.C. Police and Firefighters Pension Plan and the Park Police work force using information obtained from the Board of the retirement plan and from the Park Police. We ran each of the 30 officers through the model using their age, years of service, and salary as of September 30, 1984. We considered the possibility that these employees may have chosen to leave the Park Police or may have chosen to work more than 20 years before retiring. We also considered the possibility that they may have

**Appendix IV
Pension Costs for Park Police And
Park Rangers**

died or become disabled before retirement. We used the same future economic factors used by the Board in its latest estimates (annual across-the-board salary increase of 6 percent, annual benefit increases of 5 percent, and 7 percent interest earnings on the trust fund).

The results of our computer simulation for the 30 selected officers were as follows:

Table IV.2: Net Pension Savings if 30 Park Police Are Terminated

Present value of future benefits if the 30 employees do not terminate	=	\$8.6 million
Present value of future 7-percent employee contributions if the 30 employees do not terminate	—	0.6 million
Present value of future employer's net normal cost pension accruals if the 30 employees do not terminate	—	4.5 million
Amount of accumulated 7-percent employee contributions returned to the 30 employees if they do terminate	—	0.3 million
Net pension savings over and above the continuing savings in pension cost accruals if the 30 employees are terminated		\$3.2 million

Table IV.3: Minimum Savings Scenario

Assumptions:		
84 Park Police positions eliminated in the field.		
50 Park Police positions permanently added in Washington, D.C., because of changeover.		
91 Park Ranger positions filled by transfers and subsequent new hires.		
Annual costs at 1984 salary levels.		
Pension accruals eliminated as a result of terminating 84 Park Police officers	=	\$1.2 million^a
Pension accruals added as a result of 91 new Park Ranger hires and 50 new Park Police positions in Washington, D.C.	—	1.16 million ^b
Recurring annual net savings	—	\$0.04 million

^aSalary of 84 Park Police officers of \$2.22 million x 0.54 net normal cost accrual rate.

^bSalary of 50 Park Police officers of \$1.37 million x 0.54 net normal cost accrual rate plus salary of 91 Park Rangers of \$1.90 million x 0.219 net normal cost accrual rate

**Appendix IV
Pension Costs for Park Police And
Park Rangers**

Table IV.4: Maximum Savings Scenario

Assumptions:

84 Park Police positions eliminated in the field.

50 Park Police positions added in Washington, D.C., which would have been added anyway

91 Park Ranger positions filled by transfers and elimination of positions throughout the Park Service

Annual cost at 1984 salary levels.

Pension accruals eliminated as a result of terminating 30 Park Police positions	= \$1.2 million in recurring annual net savings
---	---

Requests for copies of GAO reports should be sent to:

U.S. General Accounting Office
Post Office Box 6015
Gaithersburg, Maryland 20877

Telephone 202-275-6241

The first five copies of each report are free. Additional copies are \$2.00 each.

There is a 25% discount on orders for 100 or more copies mailed to a single address.

Orders must be prepaid by cash or by check or money order made out to the Superintendent of Documents.

33876

United States
General Accounting Office
Washington, D.C. 20548

Bulk Rate
Postage & Fees Paid
GAO
Permit No. G100

Official Business
Penalty for Private Use \$300

A handwritten signature or set of initials, possibly 'JF', written in dark ink. The letters are stylized and cursive.