

A brown bear is shown in profile, standing in a field of tall grass. The bear is looking towards the right. In the background, there are green mountains with some snow patches under a cloudy sky. The text is overlaid on the upper part of the image.

**U.S. Fish and Wildlife Service
Office of Law Enforcement
Strategic Plan
2016 – 2020**

Protecting Our Wildlife and Plant Resources

I. Our Mission

The mission of the Office of Law Enforcement is to protect wildlife and plant resources through the effective enforcement of federal laws. By working with federal, state, tribal and foreign enforcement agencies and other conservation partners we help recover endangered species, conserve migratory birds, preserve wildlife habitat, safeguard fisheries, combat invasive species, and promote international wildlife conservation.

We focus on potentially devastating threats to wildlife and plant resources including illegal trade, unlawful commercial exploitation, injurious species, habitat destruction and degradation, environmental contaminants, and industrial hazards. Our work remains critical to conservation in this country and around the world as wildlife and plant populations and their habitats face the uncertainties of climate change and continuing threats such as global trafficking of imperiled species.

This work includes:

- Breaking up international and domestic wildlife trafficking rings that exploit protected animals and plants here and around the world
- Protecting wildlife from environmental contaminants and industrial hazards
- Safeguarding habitat for threatened and endangered species and supporting landscape conservation
- Enforcing federal migratory game bird hunting regulations and working with states to protect other game species and preserve legitimate hunting opportunities
- Inspecting wildlife shipments to ensure compliance with laws and treaties and detect illegal trade
- Preventing the introduction and interstate spread of invasive and injurious species
- Working with other federal, state, tribal and foreign law enforcement officers to safeguard U.S. species and their habitats and to combat global wildlife trafficking
- Training other federal, state, tribal, and foreign law enforcement officers
- Using forensic science to analyze evidence and solve wildlife crimes
- Conducting outreach to industry, trade groups, and others to promote wildlife conservation and secure voluntary compliance with wildlife laws
- Engaging Americans as conservation partners by connecting people with nature
- Fully supporting and participating in the Urban Wildlife Conservation Program

II. How We Address Threats to Natural Resources

In the years ahead, the Office of Law Enforcement will confront increasingly complex threats to wildlife and plant resources and mounting obstacles to conservation. This section looks briefly at five key areas in which the OLE must focus their efforts to ensure the long-term sustainability of wildlife and plant populations.

One of these challenges-climate change- represents a long-term global transformation that will make species worldwide more vulnerable. . The second- global wildlife trafficking- poses a significant threat to animal and plant species worldwide. Another challenge requires the use of law enforcement in support of the Service's on-the-ground conservation efforts to strategically conserve habitat and key species on a landscape scale. The fourth and fifth areas where the OLE needs to focus are the need to balance energy development and wildlife conservation, and preventing the introduction and spread of invasive species. As we discuss these five key areas in more detail, it will become clear that in some respect they are all intertwined, especially with climate change.

Responding to Climate Change

Scientists worldwide agree that human activities on earth are drastically changing the planet and its climate. The Service and conservation organizations across the globe are grappling with what those changes mean for fish, wildlife, plants, and their habitats.

We already confront such changes. Polar regions have been among the first to experience the profound effects that climate change is having on our planet. The listing of the polar bear as threatened under the Endangered Species Act represented the first, but surely not the last, designation of a species for more rigorous protection due in large part to climate change. "Natural" or assisted migration and adaptation may help some species, but when habitat becomes uninhabitable, others will have nowhere to go.

The Office of Law Enforcement and the rest of the Service are taking concrete steps to reduce our own contributions to climate change. We will "green" our vehicle fleet so that our officers reduce the amount of greenhouse gases they add to the atmosphere. We will make increased use when possible of telecommuting and videoconferences; improve energy efficiency at our facilities; and find other ways to reduce our carbon footprint.

Most importantly, we will enforce the Nation's wildlife laws effectively to protect species and ecosystems worldwide to confront the greatest challenge to wildlife, plants, and habitat in human history. We expect climate change to continue intensifying existing pressures on the sustainability of wildlife resources. These pressures, addressed in other sections of the Strategic Plan include unsustainable commercialization of plants (timber) and wildlife; wildlife mortality from industrial operations and spills; habitat loss; water scarcity; and the introduction and interstate transport of invasive species. We will remain vigilant in monitoring the effects of these incidents, and will respond with enforcement and prosecution to address these and other threats facing U.S and foreign species.

Combating Domestic and Global Wildlife Trafficking

The global community today struggles to protect more than 30,000 different animal and plant species from unsustainable trade under the Convention on International Trade in Endangered Species of Wildlife Fauna and Flora (CITES). That number has increased by more than 75 percent in the last 20 years. Black market trafficking in fish, wildlife, timber and plants involves transactions each year worth billions of dollars worldwide despite efforts by nations across all continents to fight it.

The U.S. remains one of the world's largest markets and is increasingly becoming a source country for wildlife and wildlife products, both legal and illegal. Illegal global trafficking represents a threat to the continued viability of thousands of fish, wildlife, and plants around the world. In some regions, it threatens to undermine not only natural areas, but also destabilizes governments, economies, and the rule of law itself.

The Department of the Interior is among the leading agencies addressing the requirements of Executive Order 13648 "Combating Wildlife Trafficking" which established the Presidential Task Force on Wildlife Trafficking, co-chaired by the Secretary of the Interior. In February 2014, the task force released the *National Strategy for Combating Wildlife Trafficking* that identified strengthening enforcement as a key strategic priority. Specifically, the National Strategy tasks agencies to strengthen interdiction and investigation efforts collaborate with foreign governments to build enforcement capacity, and support the development and use of effective technologies and analytical tools. To help meet this responsibility, the Service is building upon its proven record of accomplishments.

The Service's investigation of wildlife trafficking, and assistance to international counterparts, disrupts highly organized smuggling networks trafficking wildlife around the globe. The Service's trade monitoring activities at U.S. ports provide a front-line defense against illegal wildlife trade. Service wildlife inspectors process declared shipments, utilize intelligence to intercept wildlife contraband, conduct proactive enforcement operations to catch smugglers, often in conjunction with other federal agencies; and work with special agents to investigate businesses and individuals engaged in illegal wildlife trafficking. Service law enforcement officers also work to prevent the introduction of invasive species via international trade and travelers. In addition, special agents and wildlife inspectors enforce prohibitions on the importation and interstate transport of injurious wildlife.

Additionally, the Service provides investigative expertise and related support to U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) to implement the 2008 amendments to the Lacey Act for regulating the importation of timber and wood products protected under the conservation laws of other countries. These amendments are designed to foil illegal logging (a major threat to forests throughout the developing world) and protect the U.S. wood and wood products industry from being undercut by black market trafficking. Our plant-related investigations in the past focused on CITES species or species protected under the Endangered Species Act or State laws. Our enforcement mandate now extends to plants and plant products harvested and exported in violation of the conservation laws of any country.

The Service operates an International Attaché program with the goal of assisting foreign governments to better investigate and apprehend violators who unlawfully exploit their wildlife and timber resources. This program helps build capacity in countries that drive or enable the market for illegal wildlife by supporting direct partnerships with foreign governments to share and coordinate intelligence, expand training programs, and provide technical assistance in customs monitoring.

The Service's Office of Law Enforcement must respond to this global trafficking threat by working to close U.S. markets to illegal wildlife and plants. Wildlife and timber populations worldwide will benefit from our investigations, intelligence sharing and expertise in detecting and disrupting wildlife smuggling networks. With our wildlife inspection program and wildlife forensics laboratory, the United States is the only nation in the world with a port inspection force focused on interdicting wildlife smuggling and with the full range of forensic analyses to support our cases.

We will expand our efforts to pursue complex investigations by coordinating similar investigations that cross state, regional, and international boundaries. We stand ready to assist partners worldwide in protecting wildlife resources. We will look for new ways to engage investigative agencies in other nations to apprehend profiteers from this unlawful activity and increase capacity to stop the poaching where it starts.

Landscape Conservation Approach

The Service recognizes the importance of addressing conservation challenges on a landscape scale, in cooperation with other conservation agencies and organizations. The Service's national network of Landscape Conservation Cooperatives (applied conservation science partnerships focused on a defined geographic area) helps identify priority species and habitats for active management within landscapes in response to both climate change and non-climate stressors. Law enforcement provides a critical "tool" for protecting species and habitat from some of these stressors within and across landscapes.

Our work in the years ahead will focus on addressing the problems identified by Land Conservation Cooperatives (LCCs) that constitute threats to wildlife (or potential threats to wildlife) and doing so in concert with the wildlife conservation and management projects fueled by the science of LCCs. The species, places, and priorities of concern to LCCs will trigger proactive responses from our officers when the issues at stake include actions or impacts that constitute potential violations of federal wildlife laws.

Examples range from reaching out to companies that fail to take steps to protect migratory birds and eagles from hazards created by their ongoing operations, to investigating the take of endangered or threatened species caused by human destruction of their habitat. Our presence can help engage reluctant private sector partners in the stewardship required by federal wildlife laws. Our investigative skills will be critical to bringing to justice individuals and businesses that traffic in protected animals and plants; contaminate the environment we share; and plunder resources ranging from wildlife and water to timber and archeological artifacts from refuges, parks, marine sanctuaries, and other protected areas.

Just as LCCs pool biological expertise across regions, agencies, and institutions, so too must we work across regional lines, State borders, and other jurisdictional boundaries to address illegal activities that represent an obstacle to species and habitat conservation. In some cases, we will team with federal partners such as the Environmental Protection Agency to address issues that range from pesticide misuse to Clean Water Act violations that affect wildlife. In others, we will work with State or Tribal wildlife agencies to help them safeguard their protected wildlife and plant resources from interstate and international trafficking, prevent the transportation of disease-bearing wildlife from state to state, and forestall the introduction of invasive species across their borders.

Two of the areas we cite for LCC support; take of protected species in connection with industrial activities, specifically energy production, and invasive species, represent major challenges in and of themselves.

Energy Development and Conservation

The United States has embarked on a dual quest to secure energy independence and reduce its reliance on traditional nonrenewable energy sources (coal, gas, oil) whose use contributes to climate change. Progress on these goals, however, brings a variety of threats to wildlife. Service law enforcement, for example, has worked for decades to promote the use of bird/bat-friendly technology and avian safeguards by oil and gas producers and the electric utility industry. We are shepherding in a new era of promoting responsible renewable energy development by working with the wind, solar, and other renewable energy industries to minimize impacts on wildlife. We will investigate and hold companies accountable when they ignore Service endorsed guidance and violate conservation laws.

While wind power promises to be an important part of the Nation's strategy for reducing its reliance on nonrenewable resources and addressing climate change, wind farm operations are responsible for killing significant numbers of birds (including eagles), bats, and other species. The issuance of voluntary conservation guidelines for this industry in 2012, in combination with the eagle take permit regulations issued in 2009 (and the eagle regulation revisions projected for late 2016), have set the stage for increased outreach and investigative efforts to address the impact of wind power operations on protected wildlife. Similarly, solar facilities and their impacts to migratory birds, especially concentrated solar thermal or "power tower" technology, are a fast-growing and increasingly significant part of the renewable energy equation. Conservation guidelines for solar energy facilities are currently being developed.

Invasive Species Concerns

Climate change has the potential to affect all wildlife populations, including the distribution of invasive species. Non-native plants and animals often create environmental havoc, cause economic damage, and imperil human health.

The United States has long recognized the need to prevent the importation of "injurious" wildlife. In 1900, the Lacey Act (the Nation's first wildlife law) banned the entry of mongooses, fruit bats, English sparrows, and European starlings because they could harm U.S. crop production and horticulture. Today, this statute empowers the Secretary of the Interior to prohibit the importation

and interstate transport of any wildlife species deemed harmful to human beings, wildlife, or economic interests.

With climate change fueling the distribution, abundance, and impact of invasive species, increased enforcement efforts by both federal and state wildlife agencies will be needed to stem the deliberate introduction of harmful exotics into the United States and their subsequent movement from state to state. New injurious species listings and listing strategies are likely under the Lacey Act, as is greater regulation of live wildlife trade based on the cross-border and global spread of human and animal diseases. Increased coordination and cooperation among regulatory agencies will bring new responsibilities and challenges to wildlife law enforcement.

Our enforcement officers will work closely with federal and state counterparts to detect and deter the importation and interstate transport of federally listed injurious wildlife, other prohibited or problematic nondomestic animals, and species deemed harmful under state law. Such vigilance will help prevent unwanted species introductions and help limit one key stressor on U.S. wildlife, plants, and their habitats. It may also prove critical to the health of populations, individuals, and species – including our own.

III. Office of Law Enforcement Strategic Framework

This section presents the Office of Law Enforcement's strategic framework. This framework identifies our mission and our strategic goals and objectives, which together describe what we will accomplish and how we will achieve these results. This strategy will guide and inform our planning and decision-making over the next five years.

We use the following terms to frame our strategy:

Mission: the guiding and overarching purpose of the Office of Law Enforcement, which provides the basis and rationale for all that we do.

Strategic Goals: what we intend to accomplish and succeed over the next five years as we focus the resources of the OLE on global wildlife trafficking, protecting the Nation's fish, wildlife, and plants from unlawful exploitation, industrial hazards, and habitat loss; , facilitating and expediting legal trade and management accountability.

Overall Performance Indicators: the objective metrics that we will use to measure and report on the achievement of our strategic goals.

Objectives: the intermediate accomplishments necessary for meeting our strategic goals. Our strategy assumes that if we succeed in accomplishing our objectives, then we will also be successful in achieving our strategic goals.

Cross-cutting Objectives: the objectives that directly contribute to the accomplishment of more than one strategic goal.

Key Strategies: the first and most immediate actions we must take in order to achieve our objectives.

Performance Indicators: the metrics that will be used to measure and report on our success in meeting our objectives.

Taken together, our goals, objectives, strategies, and indicators define what we ultimately want to accomplish, identify how we will do so, and provide us a system for measuring and reporting our success. This strategic framework is a dynamic system that will enable us to learn from our experiences and adjust to evolving challenges.

Mission

The mission of the Office of Law Enforcement is to protect wildlife and plant resources through the effective enforcement of federal laws. By working with federal, state, tribal and foreign enforcement agencies and other conservation partners we help recover endangered species, conserve migratory birds, preserve wildlife habitat, safeguard fisheries, combat invasive species, and promote international wildlife conservation.

Strategic Goals

The Office of Law Enforcement has four strategic goals:

- Combat Global Wildlife Trafficking
- Protect the Nation's fish, wildlife, and plants from unlawful exploitation, industrial hazards, and habitat loss
- Facilitate and expedite Legal Trade
- Enhance Management Accountability

Each of these goals is explained separately in this section along with the relevant objectives, strategies, and performance indicators.

Combat Global Wildlife Trafficking

The United States is one of the world's largest markets and increasingly a source for wildlife and wildlife products, both legal and illegal. Trafficking remains a significant threat to thousands of animal and plant species around the world – species that are also under pressure from human encroachment on habitat and the continuing impacts of climate change.

The Office of Law Enforcement upholds U.S. responsibilities to police wildlife trade and shut down U.S. markets for species that are prohibited under the Convention on International Trade in Endangered Species (CITES) and U.S. laws and regulations. We further support global wildlife conservation by barring the importation of wildlife and plants banned from trade under foreign law and working to improve the infrastructure for wildlife law enforcement in other countries.

Our inspection operations at ports of entry and investigative efforts also protect U.S. wildlife resources and habitat by preventing the importation and interstate transport of injurious species. As the Nation's front-line defense against this threat, we help the country combat the introduction and spread of non-native wildlife by intercepting outlawed "invaders" on import and forestalling their movement from state to state.

Strategic Goal: Prevent the unlawful import, export, interstate and foreign commerce of fish, wildlife, and plants and injurious species

We will use the following overall performance indicators to measure our success in meeting this strategic goal:

Overall Performance Indicators: **Number of unlawful CITES Appendix I, Threatened, or Endangered animals interdicted**

Number of unlawful shipments interdicted containing CITES Appendix I wildlife parts and products

Number of unlawful CITES Appendix II and III shipments interdicted

Value of unlawful CITES Appendix II and III shipments interdicted

Number of injurious animals interdicted

To achieve our strategic goal of preventing illegal trafficking in fish, wildlife, and plants and injurious species, we must accomplish the objectives presented below. We will use the performance indicators shown to measure and monitor our progress in meeting these objectives.

Objective: **Improve effectiveness in intercepting shipments containing illegal or injurious species**

Performance Indicators: Number of declared shipments interdicted

 Number of seizures from undeclared shipments

 Percentage of declared high-risk shipments found to contain illegal wildlife

Objective: **Disrupt or dismantle international and domestic criminal enterprises**

Performance Indicators: Number of enterprises involved in illegal activities that are penalized (i.e., convicted, fined, or license revoked)

 Value of illegal commercial activity by disrupted enterprises

 Number of joint wildlife or plant trafficking investigations with foreign partners

Objective: **Apprehend individuals who violate wildlife and plant trade laws**

Performance Indicators: Number of individuals involved in illegal activities who are penalized (fined or convicted)

 Value of illegal commercial activity by individuals

Objective: **Provide information, technical assistance, and training to international governments to support wildlife and habitat conservation**

Performance Indicators: Number of training sessions conducted for international partner organizations

 Number of international partner organizations receiving training

 Number of Wildlife Enforcement Networks in which the OLE is a participant

We have identified four key strategies to accomplish these objectives and meet this strategic goal.

Key Strategies: **Increase/maintain focus on high-risk shipments**

Increase focus on investigations of illegal activities that pose the greatest conservation risk

Increase the efficiency and effectiveness of investigations and inspections by using support positions, technological advances and K9 teams

Enhance evidence collection and forensic analysis

Protect the Nation’s fish, wildlife, and plants from unlawful exploitation, industrial hazards, and habitat loss

The Office of Law Enforcement investigates crimes that involve the unlawful exploitation of federally protected resources, including endangered and threatened animals and plants native to the United States, migratory birds, and marine mammals. Our officers pursue habitat destruction cases under the Endangered Species Act; promote and monitor Habitat Conservation Plans; and support the wildlife and habitat conservation efforts of the Service’s Landscape Conservation Cooperatives. We also work in partnership with industries to reduce the effect of their operations and facilities on wildlife resources.

Our diligence helps reduce the impact of such manmade pressures on fish, wildlife, and plant populations as unsustainable use, illegal take, environmental contaminants, and industrial hazards – pressures that will become increasingly problematic as species struggle to adapt to changing climates and evolving ecosystems.

Strategic Goal: Protect the Nation’s fish, wildlife, and plants from unlawful exploitation, industrial hazards, and habitat loss

We will use the following overall performance indicators to measure our progress in meeting this strategic goal:

Overall Performance Indicators: **Future loss of wildlife/plants prevented by disruption of illegal activity ***

Amount of restitution dollars collected to support conservation as a result of investigations

**Data for this overall performance indicator will reflect total actual loss of wildlife/plants caused by the illegal activity and project that the same level of loss would have continued to occur in out-years if we had not stopped the illegal activity. Data reporting categories for this indicator will include endangered and threatened species; migratory birds; marine mammals; bald and golden eagles; and State-protected wildlife by Class. See Appendix A for a more detailed discussion of the utility of this overall performance indicator.*

To achieve our strategic goal of protecting the Nation’s fish, wildlife, and plants, we must accomplish the four objectives identified below. We will use the performance indicators shown to measure and monitor our progress in meeting these objectives.

Objective: **Disrupt or dismantle criminal enterprises involved in illegal commercialization of wildlife and plants**

Performance Indicators: Number of enterprises involved in illegal activities that are penalized (convicted, fined, or license revoked)

Value of illegal commercial activity by disrupted enterprises

Objective: **Improve effectiveness in intercepting shipments containing unlawful exports of U.S. fish, wildlife, and plants**

Performance Indicators: Number of declared export shipments of native species interdicted

Number of seizures of native species from undeclared export shipments

Percentage of declared high-risk export shipments of native species found to contain illegal wildlife

Objective: **Apprehend individuals who violate federal conservation laws**

Performance Indicators: Number of individuals involved in illegal activities who are penalized (convicted or fined)

Value of illegal commercial activity by individuals

Objective: **Reduce the impact of industrial hazards on trust species of fish and wildlife and address unlawful habitat destruction**

Performance Indicators: Number of conservation agreements, plans, or compliance actions by industry involving cooperation with OLE

Number of cases involving companies or other entities whose activities unlawfully impact U.S. species and their habitat

We have identified three key strategies to accomplish these objectives and thus meet our strategic goal.

Key Strategies: **Increase focus on investigations of illegal activities that pose the greatest conservation risk**

Increase the efficiency and effectiveness of investigations and inspections by using support positions and technological advances

Enhance evidence collection and forensic analysis

Facilitate and Expedite Legal Trade

Our mandate to enforce wildlife trade laws also encompasses a responsibility to deal fairly and efficiently with the industries, organizations, and individuals whose import/export activities we regulate. Our wildlife inspectors currently process more than 170,000 declared wildlife shipments annually, and we expect that volume to grow. By law, virtually all wildlife imports and exports must be declared to us and cleared by our inspectors.

The speed and efficiency of our work affects the ability of businesses to successfully engage in trade and the international movement of wildlife for purposes that range from scientific research to public entertainment. Our inspection operations also affect individuals who travel internationally with wildlife or wildlife items, move their hunting trophies across U.S. borders, or ship household goods made from wildlife overseas and back again.

In 2014, the President of the United States signed an Executive Order to create the International Trade Data System (ITDS) with the intention for implementation by December 2016. This Order streamlines the processes for importing and exporting cargo by providing a “single window” through which importers and exporters submit shipping information directly to all applicable government inspection agencies. This window, the Automated Commercial Environment (ACE), will considerably enhance the ability of US companies, specifically small and medium businesses, to better compete in the global economy. The Office of Law Enforcement – Wildlife Inspection Program will fully participate in this endeavor.

Strategic Goal: Facilitate the expeditious movement of legal wildlife

We will use the overall performance indicator shown below to measure our progress in meeting this strategic goal:

Overall Performance Indicator: **Number and percentage of low-risk shipments cleared each day**

To achieve our strategic goal of facilitating the expeditious movement of legal wildlife, we must accomplish the objective identified below. We will use the performance indicators shown to measure and monitor our progress.

Objective: **Increase the efficiency of clearing legal wildlife imports/exports**

Performance Indicators: Percentage of declarations filed electronically

Percentage of inspection fees paid online

Number of corporate payment accounts

We have identified four key strategies to accomplish our objective and meet this strategic goal.

Key Strategies: **Create a screening methodology to distinguish risk levels of wildlife shipments**

Participate in the National Targeting Center and facilitate information sharing with inspectors and agents

Improve processes for managing wildlife declarations and inspection procedures

Increase coordination with brokers, importers, exporters, and other organizations involved in wildlife trade

Enhance Management Accountability

Our success in protecting the Nation’s wildlife and plants, stemming global wildlife trafficking, and facilitating legal wildlife trade (the strategic goals presented previously) will depend on how well we support and manage our people. We must also ensure that we minimize our own impact on the environment we share with the resources we protect.

Our employees are our greatest asset. We will ensure that they receive guidance, quality training, operational support, and professional development to function as effectively as possible. We will continue a strong culture of leading by example, not only in OLE but also within the Service and the broader national and international conservation communities. We will implement the Service’s Diversity and Inclusion Plan to recruit and retain a workforce that resembles America because we value diversity of ideas and perspectives. This will make us stronger and better able to address ever-developing organized criminal enterprises.

We will use workforce planning to put people with the right skills in the right place at the right time. To accomplish this we will recruit and deploy appropriate personnel to support our primary functions, investigations and inspections. These support positions (administrative, technical, and logistical) are critical in enabling our special agents and wildlife inspectors to focus on our Strategic Goals. We will leverage information technology (IT) to support our investigative and inspection efforts and manage our program, including improving our Law Enforcement Management Information System (LEMIS), and participating in new interagency initiatives like the International Trade Data System (ITDS) and the Commercial Targeting and Analysis Center (CTAC).

We will reduce our contributions to climate change, and will support efforts of the Service to address this critical conservation challenge. We will respond not only by protecting increasingly vulnerable wildlife, plants, and habitat from crime, but also by reducing our own production of greenhouse gases. We will use less energy by finding “greener” ways to manage our facilities, workforce, vehicles, and communications.

Strategic Goal: Manage Office of Law Enforcement resources to ensure program performance, efficiency, and effectiveness

To achieve this strategic goal, we must accomplish the four objectives identified below. We will use the performance indicators shown to measure and monitor our progress.

Objective: **Respond to climate change challenges**

Performance Indicators: Increase energy efficiency of facilities we own or work with GSA to increase efficiency of facilities we lease

Number of low or no emission vehicles purchased

Number of employees who use scheduled telework or alternative work schedules

Number of employees that utilize mass transit or carpooling

Objective: **Utilize workforce planning to meet OLE strategic goals**

Performance Indicators: Number of standard position descriptions developed

Number of standard position descriptions in use

Development of standard organizational staffing structure

Objective: **Use information technology to improve program efficiency**

Performance Indicators: Develop and implement improved capabilities for the Law Enforcement Management Information System (LEMIS)

Develop and implement Service interface with the International Trade Data System (ITDS)

Develop and implement Service interface with the Commercial Targeting and Analysis Center (CTAC)

Objective: **Provide opportunities for career development and ensure professional integrity of the OLE workforce**

Performance Indicators: Number of hours of documented training

Number of OLE employees attending structured professional development courses (e.g. ALDP, SUTL, Harvard Kennedy School...)

Number of integrity issues identified

Number of integrity issues resolved

Cross-cutting Objectives

In this strategic framework, three cross-cutting objectives will be essential to accomplishing our mission. These cross-cutting objectives are landscape conservation, enforcement partnerships, and public outreach.

Although the Nation's wildlife laws focus primarily on protecting specific species, the survival of animal and plant populations is inextricably linked to the preservation of suitable habitat. This linkage drives the Service's focus on addressing both conservation science and conservation management on a landscape scale. It fuels our commitment to using our enforcement authority under federal wildlife laws to help the Service and its LCCs pursue landscape-scale conservation goals when threats to species or habitat constitute crimes as well as obstacles to conservation. We are also committed to using this authority and sharing our expertise on the global front to help sustain wildlife and plant populations in other countries where poaching, illegal trade, and habitat loss push species to the brink of extinction.

Our efforts to protect U.S. wildlife resources and combat global wildlife trafficking receive significant support from law enforcement partnerships. We foster and maintain cooperative working relationships with a range of other enforcement agencies in the United States and around the world. Examples include federal entities (such as Customs and Border Protection, the National Oceanic and Atmospheric Administration, and the Environmental Protection Agency); State and Tribal fish and game agencies; international alliances (such as the CITES community and Interpol); regional enforcement networks (such as the North American Wildlife Enforcement Group and global Wildlife Enforcement Networks like the Association of Southeast Asian Nations Wildlife Enforcement Network), and customs and wildlife protection units in other countries.

Our officers work to help brokers, importers, exporters, hunters, landowners, industry groups, and others to understand and obey federal laws that protect wildlife and plant resources. Proactive outreach is vital to both securing compliance and promoting cooperative conservation efforts by those whose activities affect wildlife, plants, and their habitat. We also help improve public understanding of, and appreciation for, the ways in which we all "connect" with wildlife and the natural world. We will look for ways to be fully engaged in Service initiatives like Connecting People with Nature and the Urban Wildlife Conservation Program (110 FW 1).

We must address the three cross-cutting objectives presented below to accomplish our goals and fulfill our mission. We will use the performance indicators shown to gauge our progress.

Objective: **Use enforcement resources to support landscape conservation**

Performance Indicators: Number of investigations involving high priority species

Number of investigations involving the import and/or interstate transport of injurious species

Objective: **Increase cooperation with law enforcement partners on information sharing and investigations**

Performance Indicators: Number of investigative hours on our cases by enforcement partners (non-FWS)

Number of deputy game warden agreements with other agencies

Number of joint investigations

Number of law enforcement partner organizations receiving training

Number of law enforcement partner training sessions conducted

Objective: **Participate in outreach and education to increase compliance with federal conservation laws and connect people with nature.**

Performance Indicators: Number of customer organizations receiving outreach/training

Number of customer outreach/training sessions conducted

Number of requests filled for forfeited/abandoned wildlife items for use in outreach and education

Number of wildlife items supplied for outreach and educational use

Number of hits on Office of Law Enforcement websites (National, Forensic Lab, Repository)

Number of hits on social media on OLE activities

Number of press releases on OLE activities

Number of Urban Wildlife Conservation Program events in which OLE participated

Number of Connecting People with Nature events in which OLE participated

IV. Critical Support Functions

As noted in our strategic framework, access to advanced evidence collection, forensic analysis, and intelligence is critical to our ability to meet our goals and objectives. We are committed to enhancing the intelligence support available to our special agents and wildlife inspectors in the field. We also recognize the need to expand our evidence collection and analysis capabilities – an expansion that will in many areas involve our Forensics Laboratory. Our Digital Evidence Recovery and Technical Support Unit will also play a key role in this arena.

This section describes the current baseline functions of the Laboratory, our new technology-focused investigative support unit, and our Intelligence Unit. It also provides information on the National Wildlife Property Repository and the National Eagle Repository – facilities under our management that make unique contributions to conservation education and Native American communities.

Wildlife Forensics Laboratory

The National Fish and Wildlife Forensics Laboratory, located in Ashland, Oregon, is the world's leading full-service crime laboratory devoted exclusively to supporting wildlife law enforcement. Scientists at the Laboratory identify the species of wildlife parts and products seized as evidence. They link suspect, "victim," and crime scene through the examination and comparison of physical evidence; determine the cause of death of wildlife crime victims and help analyze crime scenes.

Laboratory scientists also conduct research to develop new analytical techniques needed in wildlife forensics. They provide training on species identification and evidence handling to Service law enforcement officers and their global counterparts. The Laboratory holds accreditation from the American Society of Crime Laboratory Directors – a professional status attained by only half the crime laboratories in the United States.

Digital Evidence Recovery and Technical Support Unit

This Unit (called DER/TSU for short) provides special technological expertise to facilitate Service investigations of wildlife crime. Staffed by special agents and specialists with computer forensic and investigative skills, the DER/TSU helps our officers identify, retrieve, analyze, and utilize "e-evidence" of wildlife crimes. DER/TSU functions also include providing the latest highly sophisticated electronic surveillance technology and other "high-tech" tools in support of Service investigations.

DER/TSU staff work on investigations undertaken by Service officers in the field. Efforts range from supporting search and seizure activities involving computers and portable electronic devices to deploying special surveillance equipment to track vehicles, vessels, packages, or people. DER/TSU also works in tandem with a network of regional "collateral duty" employees with expertise in these areas to keep them up to speed and advises regions on equipment purchases and other resource investments involving digital data analysis and electronic surveillance.

Intelligence Unit

OLE's Intelligence Unit collects and analyzes information on all aspects of wildlife crime to support Service investigations and inspections. The Unit coordinates intelligence sharing with other law enforcement agencies and maintains liaison with U.S. and international enforcement networks and conservation groups. Intelligence analysts also provide a variety of "direct services" to officers in the field – services that range from driver's license checks to in-depth research to track the movement of illegal wildlife shipments across the globe.

This work in all of its aspects has become increasingly important and complex given the global scope and growing sophistication and organization of wildlife crime. Intelligence support is vital to our efforts to identify, penetrate, and break up wildlife trafficking networks. Access to comprehensive, well-analyzed intelligence data also helps our managers identify threats to species and plan and prioritize investigative efforts and smuggling interdiction operations.

National Wildlife Property Repository

This Repository, located on the Rocky Mountain Arsenal National Wildlife Refuge outside of Denver, Colorado, provides secure, environmentally controlled storage for wildlife parts and products that have been abandoned or forfeited to the government as a result of Service inspections and investigations. The Repository helps connect people with nature and educate the public about the impact of illegal wildlife trade by supplying wildlife parts and products for use in conservation outreach programs that range from "hands-on" learning experiences to museum displays.

National Eagle Repository

The National Eagle Repository serves as a national center for receiving and distributing bald and golden eagle carcasses and parts to Native Americans for religious use. This facility, which is co-located with the National Wildlife Property Repository, helps meet legitimate religious needs of enrolled members of federally recognized Tribes by providing centralized salvage and distribution of eagle parts to Tribal members.

Appendix A. *Future Loss Performance Indicator*

The Office of Law Enforcement's efforts to investigate wildlife crimes and enforce U.S. wildlife protection laws help preserve the Nation's fish, wildlife, and plant resources. Specifically, our investigations disrupt illegal activity that adversely affects wild populations of these resources – activity such as unlawful take, commercial exploitation, and habitat destruction.

We recognize that other law enforcement organizations often measure their success by counting closed cases, calculating crime rates, and claiming deterrence as their long-term benefit to the communities they serve. As officers dedicated to wildlife law enforcement, we maintain that the best way to measure our contribution to wildlife conservation is to assess, to the extent possible, our impact on the resource itself. We have focused, therefore, on looking at the unlawful activity we disrupt and the effect of that disruption on fish, wildlife, and plant resources to develop an overall performance indicator for strategic goal: Protect the Nation's fish, wildlife, and plant resources from unlawful exploitation, industrial hazards, and habitat loss.

Measuring Future Loss

While it can be difficult (if not impossible) to calculate the contribution that law enforcement makes to the recovery and conservation of species, we can usually document with reasonable accuracy the death toll or loss associated with any single investigation. We know, for example, how many dead migratory birds are recovered from an open pit at an oil production facility or how many dead bald eagles were used to supply the eagle parts seized in a wildlife trafficking case. We can count the number of headless walrus carcasses left behind by hunters engaged in the illegal ivory trade and estimate the number of paddlefish illegally harvested to provide a caviar trafficker a specific tonnage of contraband roe.

It can reasonably be assumed that a comparable level of loss (i.e., wildlife/plant mortality or, in the case of live resource trafficking, removal of specimens from the wild) would continue each year from the illegal activity if it had not been disrupted. For example, a network of reptile dealers who profited from the unlawful interstate sale of 743 protected snakes and turtles would presumably continue to collect and sell reptiles at the same rate in subsequent years if this illegal enterprise had not been disrupted. Similarly, a farmer who spread Furadan-laced wheat seed over his fields and poisoned 961 migratory birds would likely use this same approach to prevent crop depredation in subsequent years if a Service investigation had not detected and stopped this illegal activity.

In the first case, the “future loss of wildlife ... prevented” can be extrapolated as “743 reptiles” for the year, while in the second, our work can reasonably be said to have forestalled the loss of 961 protected birds that otherwise would have died. Collectively then, in the simplest terms, the total “future loss of wildlife/plants prevented by disruption of illegal activity” in a given year would equal the sum of all animals and plants killed or removed from the wild by commercial enterprises, industrial operations, and individuals convicted in that year.

In tracking our actual performance, however, we will present “future loss prevented” in terms that better reflect our specific statutory responsibilities and contributions to Service mission goals. Instead of a total number of animals and plants in aggregate, we will report totals for endangered

and threatened species; migratory birds; marine mammals; bald and golden eagles; and State-protected species by Class (reptiles, mammals, etc.). This indicator will provide a measure of how our work supports the conservation of federal trust resources; it will also document our shared stewardship under the Lacey Act for an even greater diversity of fish, wildlife, and plant species.

It should be noted we recognize that this approach does not attempt to directly quantify the actual impact of our work on the population levels of specific species, and that this omission may raise questions among those accustomed to formulating such metrics for evaluating conservation programs. Assessments of “impact on populations,” however, are simply not practical given the diversity of species involved in our investigations and the time, resources, and research that would be needed to complete such analyses for each of our cases each year. Enforcement of conservation laws is, after all, only one of many factors that affect the viability of populations. Even the extent to which up-to-date population data may be available from other Service programs or external sources varies considerably for different species.

The significance of a successful wildlife crime investigation in terms of its impact on species populations will differ from case to case. We acknowledge that the information we plan to collect and report does not take population-specific significance into account and that the full importance of any future loss prevented cannot be completely captured with summary data alone. The loss of one California condor, for example, obviously carries far more significance for the wild population of these birds than does the loss of 30 Canada geese, even though both species are protected under federal law. But once again, developing and implementing such a calculus quickly becomes unwieldy, impractical, and logistically overwhelming, particularly since our officers routinely close thousands of cases each year involving an array of species.

It should be noted that our numbers will represent a relatively conservative accounting of the level of loss our enforcement efforts prevent. We will report wildlife or plant totals associated with a particular case only once, even though in many instances, our disruption of illegal activity may have forestalled years of continued take. We will not attempt to address the greater loss sustained by a population over generations when breeding specimens are removed. Nor will we try to estimate the extent to which our investigative activities prevent future loss by reducing the incentive for others to commit similar crimes or motivating them (in the case of industrial hazards) to take voluntary action to limit or remove threats to protected resources.

Deterrence

Given the obstacles to linking enforcement and the status of wild populations, why not directly address deterrence as an indicator and set up annual goals such as “reduce the number of wildlife crimes by xx percent”? To be sure, research involving traditional law enforcement agencies has shown that successful enforcement activity correlates with lower crime rates. Such studies arguably document the deterrent effect of law enforcement, but meaningful crime rates can only be developed for crimes that are known. While crimes against people are not always reported to the police, traditional crime statistics for such offenses are typically adjusted using information from other sources to account for unreported crimes.

Such adjustments between the number of crimes reported and the number of crimes committed are not, however, made for wildlife violations. In the arena of wildlife law enforcement, unreported

crimes go uncounted. Here, a crime rate would reflect only the number of crimes that happen to be discovered – a number that most agree will always fall short of the number committed.

For this reason we have no basis for determining a baseline number for wildlife crimes since the number detected and investigated is only a subset of this larger figure. When police forces add officers, crime rates typically drop. In contrast, when we add officers, we investigate more crimes; when Service special agents retire or transfer and vacancies go unfilled, case numbers fall. Under this flawed measurement system, our most effective strategy for “reducing the number of wildlife crimes” would be to reduce the number of officers available to investigate them!

We do, however, recognize the limits of the approach we have taken with this performance indicator. The concept of “future loss prevented” is neither intuitive nor easy to grasp. But prolonged and sincere grappling with the problem of measuring our performance in a meaningful way has led us to conclude that such extrapolations are as close as we can reasonably come to quantifying the impact of our work on the resource. Tracking the amount of future loss that has been prevented from occurring by our disruption of illegal activity will provide the best indicator of the extent to which we are meeting our stated goal of protecting the Nation’s fish, wildlife, and plants from unlawful exploitation, industrial hazards, and habitat loss.

Appendix B. Office of Law Enforcement Priorities

***Note:** We have included the text of U.S. Fish and Wildlife Service Manual Chapter 444 FW 1 as an appendix to this Strategic Plan because of the integral relationship between OLE's investigative priorities and the achievement of our strategic goals.*

444 FW 1 Investigative Priorities

1.1 What is the purpose of this chapter? This chapter describes the enforcement priorities for the Office of Law Enforcement. We establish priorities because:

- A.** The Office of Law Enforcement must make the most effective use possible of its staff resources.
- B.** All enforcement activities do not contribute equally to wildlife conservation.
- C.** The mission of the Office of Law Enforcement (as found in the program's Strategic Plan) is "to protect wildlife and plant resources." The priorities identified in this chapter will help law enforcement managers and officers focus their efforts accordingly.

1.2 How do Service special agents and wildlife inspectors apply enforcement priorities?

- A.** Special agents and wildlife inspectors should focus on those illegal activities having the greatest negative impact on federally protected species. They should also focus on those law enforcement activities that fall outside of the authority and/or capabilities of State and local law enforcement bodies and are clearly the responsibility of the Office of Law Enforcement. Service officers must focus on high priority enforcement work before undertaking activities designated as medium or low priority (see Section 1.3 below). Service law enforcement managers will ensure that agents and inspectors appropriately apply the guidance on enforcement priorities described in this chapter.
- B.** When an enforcement activity falls under two or more priority categories, the higher category applies. Officers should complete all priority work before undertaking any enforcement activity that falls outside of official enforcement priorities. We consider all activities within one priority level equal.
- C.** Special agents and wildlife inspectors must document all violations regardless of the priority category.
- D.** The time and effort devoted to resolving a violation should be commensurate with the priority level of the violation.
- E.** We designed these enforcement priorities to guide Service officers to be proactive with inspection activity and investigations. Do not use the priorities to prioritize work involving the inspection of imported or exported declared wildlife shipments. When conducting such inspections, officers should perform risk assessments on shipments so that they target shipments that pose the greatest risk of containing illegal wildlife (either declared or undeclared). Once you

discover a violation, apply the enforcement priorities described in this chapter to determine the amount of time and effort that you should expend to resolve it.

1.3 What are the enforcement priorities for the Office of Law Enforcement? Special agents and wildlife inspectors determine the priority of a proposed law enforcement activity based on the following guidelines:

A. High Priority. In general, high priority enforcement work deals with wild populations of federally protected species of fish, wildlife, or plants and involves violations that have a significant scope or impact on populations of such species. High priority enforcement activities include:

- (1) Unlawful commercial activities and/or activities involving habitat destruction affecting wild populations of fish, wildlife, or plants listed as endangered or threatened, or listed on Appendix I to the Convention on International Trade in Endangered Species (CITES).
- (2) Unlawful commercial activities involving wild populations of other federally protected fish or wildlife.
- (3) The unlawful take of federally protected species of fish, wildlife, or plants and/or destruction/modification of their habitats by environmental contaminants or industrial hazards such as pesticides, poisons, oil spills, cyanide leach pits, or other toxins.
- (4) Enforcement of federal laws and regulations related to federally listed threatened, endangered, or injurious species.
- (5) Other enforcement activities identified and agreed on by the Assistant Director, Office of Law Enforcement and the Director.

B. Medium Priority. Medium priority enforcement activities include:

- (1) Assisting the National Wildlife Refuge System (NWRS) and other federal agencies with conservation enforcement and other related law enforcement issues on their lands as agreed on by the Special Agent in Charge in consultation with the Regional Director (RD) or California/Nevada Operations Office (CNO) Manager, the RD/CNO Manager's designee, or appropriate federal agency.
- (2) The unlawful commercialization of wild populations of fish, wildlife, or plants that are protected by State, tribal, or foreign law, including CITES Appendix II and III species. In situations involving non-CITES species that are protected by State, tribal, or foreign law, there should be an indication that the State, tribal, or foreign government does not have jurisdiction over the principal violators and that they also actively enforce the relevant laws.
- (3) Enforcement of the Lacey Act relating to non-commercial violations involving illegal taking of wild populations of species protected by State, tribal, or foreign laws. There should be some indication that the State, tribal, or foreign government does not have jurisdiction over the primary violators and that they actively enforce the relevant laws.

(4) Enforcement of the Lacey Act as it relates to State-listed injurious species.

(5) Unlawful activities involving wild populations of other federally protected fish or wildlife.

C. Low Priority. Low priority enforcement activities include:

(1) Enforcement of federal laws and regulations related to wild populations of fish, wildlife, or plants that are protected by State or tribal governments and are not designated as medium priority above.

(2) Compliance inspections of Service permit holders.

(3) Enforcement of federal laws and regulations related to captive-bred, artificially propagated, or antique specimens of fish, wildlife, and plants. When the validity of captive-bred or artificially propagated status is in question, determine the priority as if the species were taken from the wild. When the validity of antique status is in question, determine the priority as if the species were not antique.

(4) Enforcement of federal laws and regulations related to violations involving the import or export of non-federal trust species of fish, wildlife, or plants not designated as high or medium priority above.

(5) Enforcement of federal laws or regulations for which the Service does not have primary authority, or enforcement of non-wildlife related laws or regulations that may fall within the jurisdiction of Service law enforcement officers.

(6) Violations of non-commercial foreign law.

(7) Assisting the NWRs and other federal agencies with conservation enforcement and other related law enforcement issues on their lands not designated as medium priority above.

1.4 How often are these priorities reviewed for changes? The Chief, Office of Law Enforcement should review the priorities as necessary and recommend changes to the Director.

Appendix C. Linkages with Service Climate Change Strategic Plan

The Service's *Strategic Plan for Responding to Accelerating Climate Change* identifies three major strategies that structure the agency's efforts to address this challenge. We list each of these three strategies below along with specific Service goals and then show how components of the Office of Law Enforcement (OLE) Strategic Plan (our own goals and objectives) help support their accomplishment. [**Note:** *Because we pulled specific Goals under each of the three major strategies (Goals 3, 5 and 7) in the Strategic Plan for Responding to Accelerating Climate Change, they will not be in numerical order in this document*].

Service Strategy/Goals

Adaption: Minimizing the impact of climate change on fish and wildlife through the application of cutting-edge science in managing species and habitats.

- Goal 3: We will plan and deliver landscape conservation actions that support climate change adaptations by fish and wildlife of ecological and societal significance.
 - Objective 3.1. Take conservation action for climate-vulnerable species
 - Objective 3.3. Reduce non-climate change ecosystem stressors
 - Objective 3.5 Conserve coastal and marine resources
 - Objective 3.8 Address fish and wildlife needs in renewable energy development
 - Objective 3.9: Foster international collaboration for landscape conservation

Related OLE Strategic Goals/Objectives

- Goal: *Protect the Nation's fish, wildlife, and plants from unlawful exploitation, industrial hazards, and habitat loss*
 - Objective: *Disrupt or dismantle criminal enterprises involved in illegal commercialization of wildlife and plants*
 - Objective: *Improve the effectiveness in intercepting shipments containing unlawful exports of U.S. fish, wildlife, and plants*
 - Objective: *Apprehend individuals who violate federal conservation laws*
 - Objective: *Reduce the impact of industrial hazards on trust species of fish and wildlife and address unlawful habitat destruction*
- Goal: *Prevent the unlawful import, export, interstate and foreign commerce of fish, wildlife, plants and injurious species.*

- *Objective: Improve effectiveness in intercepting shipments containing illegal or injurious wildlife*
- *Objective: Provide information, technical assistance and training to international governments to support wildlife and habitat conservation*
- *Cross-cutting Objective: Use enforcement resources to support landscape conservation*

Service Strategy/Goal

Mitigation: Reducing levels of greenhouse gases in the Earth’s atmosphere.

- Goal 5: We will change our business practices to achieve carbon neutrality by the year 2020.
 - Objective 5.1: Assess and Reduce the Carbon Footprint of the Service’s Facilities, Vehicles, Workforce, and Operations

Related OLE Strategic Goal/Objective

- *Goal: Manage OLE resources to ensure program performance, efficiency, and effectiveness*
- *Objective: Respond to climate change challenges*

Service Strategy/Goal

Engagement: Joining forces with others to seek solutions to the challenges and threats to fish and wildlife conservation posed by climate change.

- Goal 7: We will engage Service employees; our local, State, Tribal, national, and international partners in the public and private sectors; our key constituencies and stakeholders; and everyday citizens in a new era of collaborative conservation in which, together, we seek solutions to the impacts of climate change and other 21st century stressors of fish and wildlife.

Related OLE Objectives

- *Objective: Provide information, technical assistance, and training to international governments to support wildlife and habitat conservation*
- *Cross-cutting Objective: Increase cooperation with law enforcement partners on information sharing and investigations*
- *Cross-cutting Objective: Provide outreach and education to increase compliance with federal conservation laws and connect people with nature*