



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

July 22, 2019

The Honorable Lisa Murkowski
Chairman
United States Senate
Committee on Energy & Natural Resources
Washington, DC 20510

The Honorable Joe Manchin
Ranking Member
United States Senate
Committee on Energy & Natural Resources
Washington, DC 20510

Dear Chairman Murkowski and Ranking Member Manchin:

I am writing on behalf of the Public Lands Foundation (PLF) regarding a recent proposal by the Department of the Interior to functionally dismantle the headquarters office of the Bureau of Land Management (BLM) located in Washington, D.C. The PLF is strongly opposed to the proposal and feels it is imperative that the BLM Director, Assistant Directors, and multi-disciplinary resource professionals remain in Washington, D.C. where Federal agency policy, budget, and oversight functions occur and decisions are made that affect all Americans in the management of our national public lands.

The BLM is approaching its 70th anniversary year as a Federal agency and has been headquartered in the Nation's Capital throughout that time. We have to ask: why these sudden, radical changes to the organization now? What problems are the Interior Department seeking to solve?

The BLM is organizationally aligned to have office locations that provide for the appropriate coordination necessary to make sound resource management decisions. The western offices of the BLM provide the operational function for the organization. The decentralized nature of the BLM allows for efficient and timely responses to western constituents. Approximately 97 percent of the BLM employees are currently located on-the-ground in Field, District, and State Offices to make land use decisions based on public interest, resource conditions, cooperating agency concerns, and BLM policy. These local staffs build and maintain interactive relationships with Governors, state legislators, congressional members, county commissioners, tribes, other federal agencies, and various local government and user groups. The BLM State Directors and Field Managers currently have the delegated authority to make land-use decisions, leasing and permitting decisions, conduct monitoring and compliance activities, provide public land user assistance, and facilitate coordination with State and local governments, other federal agencies, and Tribes. If the goal is to place more operational employees on the ground this is not the way to proceed.

The BLM headquarters located in Washington, D.C. houses about 3 percent of the BLM employees. The Directorate and professional support staff develop national policy and regulations, prepare and manage the budget, and provide program oversight to assure efficient and consistent management across the agency. This work requires coordination and daily interaction with multiple agencies, departments, OMB, the White House, and Congressional members. In addition to these functions, it is invaluable to have staff available in Washington,

D.C. to be actively engaged and participate in day-to-day meetings and discussions regarding complex resource and political issues. The majority of the headquarters staff provide this technical expertise based on their experiences throughout the west in the various BLM Field, District, and State Offices. This has served the agency well and assures that the national interest is front-and-center as required by the Federal Land Policy and Management Act (FLPMA), assuring that no single state is the primary influencer of policy.

The PLF does not support the relocation of the BLM headquarters leadership and what appears to be over 80 percent of the headquarters professional staff to locations throughout the west. This reorganization proposal will result in a weak and ineffective management structure, a loss of national coordination and oversight capability, a loss of consistent agency policy development and implementation, and a subrogation of national interests to powerful local interests.

An agency that does not have any appreciable leadership presence in Washington, D.C. has no input into daily discussions regarding policy, budget, legislation, and resolution of routine issues. This will quickly result in a very inefficient and inconsistent organization that will be forced to make decisions State-by-State that may or may not be consistent or in the national interest. Alternatively, decisions will be elevated to the Secretary's Office, which will result in decisions made with no agency and local stakeholder input.

Second, the timeliness of nationwide policy decisions will be impacted as the employees scattered across the States will need to schedule calls and coordinate meetings to deal with what could happen in the Washington office with a quick trip down the hall and a prompt resolution. The current proposal by the Department splinters the BLM headquarters policy staffs and sends them to various locations across the west. There will be limited ability for the historic interdisciplinary coordination that occurred in the Washington office that is so important in establishing consistent procedures for the multiple-use management of our public land resources.

Third, it is important to the agency to have employees in the Washington, D.C. area that are well versed in natural resource issues that impact the western United States to not only assist in the development of policy and budget but to also assist the administration and Congress on a day-to-day basis. These employees also return to BLM field locations after assignments in the Washington office and are a tremendous asset to those they work with on the ground. This cycle of employee development will end with this proposal.

Finally, Washington, D.C. is also a location that allows the BLM to recruit and retain a more diverse workforce. This proposal will have a disproportionate effect on women and minority employees in both upper level and professional resource positions.

Most PLF members have seen a variety of reorganization efforts. For the most part they have proven to be very disruptive and costly and in the end were found to be problematic and were reversed by the next administration. As an organization, the PLF would ask that this proposal be rescinded. There is no apparent goal other than dismantling the BLM headquarters. Currently 97 percent of the BLM's employees are on the ground and making the daily decisions in the management of the public lands. The PLF supports providing more resources to State and Field Offices and the funds identified for this reorganization proposal should instead be used to hire

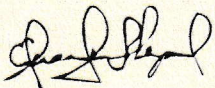
more entry level specialists in the field. If the goal is to get decisions closer to the ground, then delegate full authority to the BLM State Directors and Field Managers. As an example, the Department approves Federal Register publications. These are a routine part of the procedures for many transactions such as realty actions and land use plans. Delegate that approval to the State Directors.

Spending millions of dollars to move policy positions to operational locations in the west is not efficient when the hidden cost is the loss of the agency's ability to efficiently and timely develop policy, establish budgets, and oversee operations. This is not to mention the toll this action will take on several hundred BLM employees in the Washington, D.C. area. The BLM Directorate and professional support staff must remain in Washington for the agency to perform these functions. Without the ability of the BLM staff to quickly respond to or visit with the various other federal agencies, Congressional staffs, and stakeholder groups in the Washington, D.C. area, decisions will be made without BLM input.

The PLF is a national non-profit organization with more than 600 members, comprised principally of retired, but still dedicated BLM employees with a unique body of experience, expertise and knowledge of the multiple-use management of the public lands as prescribed by FLPMA. Many of our members have 30 years or more of experience in resource management and have worked in multiple locations. They know and understand the collaboration and coordination required when making decisions that affect multiple resources and the impact those decisions have on the various users of the public lands and resources.

The PLF would be happy to discuss our concerns or assist in any way possible to discuss organizational options that maintain the integrity of the BLM as a highly functioning agency managing the public lands for multiple uses consistent with the national interest.

Sincerely,



Edward W. Shepard, President

cc:

- Hon. Richard Shelby, Chairman, Senate Committee on Appropriations
- Hon. Patrick Leahy, Vice-Chairman, Senate Committee on Appropriations
- Hon. Lisa Murkowski, Chairman, Subcommittee on Interior, Environment & Related Agencies
- Hon. Tom Udall, Ranking Member, Subcommittee on Interior, Environment & Related Agencies
- Hon. Raul Grijalva, Chairman, House Committee on Natural Resources
- Hon. Rob Bishop, Ranking Member, Committee on Natural Resources
- Hon. Alan Lowenthal, Chairman, Subcommittee on Energy and Mineral Resources
- Hon. Paul Gosar, Ranking Member, Subcommittee on Energy and Mineral Resources
- Hon. Nita Lowey, Chairwoman, Committee on Appropriations
- Hon. Kay Granger, Ranking Member, Committee on Appropriations
- Hon. Betty McCollum, Chair, Subcommittee on Interior, Environment, and Related Agencies
- Hon. David Joyce, Ranking Member, Subcommittee on Interior, Environment, & Related Agencies