



For America's Heritage

## Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

December 7, 2017

The Honorable Bruce Westerman  
Chairman  
Subcommittee on Oversight & Investigations  
1324 Longworth House Office Building  
Washington, D.C. 20515

The Honorable A. Donald McEachin  
Ranking Member  
Subcommittee on Oversight & Investigations  
1324 Longworth House Office Building  
Washington, D.C. 20515

### **RE: Reorganizing Statement for the Record**

Dear Chairman Westerman and Ranking Member McEachin:

The Public Lands Foundation (PLF) would like to provide this letter for the record related to reorganizing the Department of the Interior and related agencies to increase efficiencies and create savings to taxpayers in the management of the federal public lands.

The PLF does not support a move of BLM's headquarters outside the District of Columbia. There are several critical reasons having a headquarters in Washington, D.C. proved valuable to administrations, Congress, the Department, the BLM and its employees over the years. Agency headquarters are designed to quickly and effectively respond to and work with Congress, the Office of the Secretary, the Office of Management and Budget, other agencies and national organizations, while also helping to meet the needs of the field personnel on the ground.

Headquarters staff serve the purpose of developing legislation upon request and national policy and regulations; developing and justifying budgets; summarizing accomplishments and responding to national issues and emergencies, often in concert with multiple agencies, departments and the White House. This includes attending impromptu yet critical meetings requiring face-to-face discussions and learning the process of how to be agile, flexible and handle difficult, complex and political discussions and situations related to the day-to-day demands of any administration, Congress, agency, community and partner. These are the same principal reasons most professional groups, associations, industries, and NGO's who work with the federal government have offices in DC.

BLM is most fortunate to have a decentralized organization with Senior Executives (State Directors) in almost every western state and line officers in Field Offices and District Offices. This was intentionally designed to build strong and interactive relationships with Governors, state legislators, congressmen and county commissioners. Headquarters is a tremendous training ground for some of the best leaders within any agency, and, in particular, critical for those that enter into executive leadership positions for the BLM. The values of the West are entrenched in BLM's culture and mission. It is also one of the best venues for the western states collectively to have a say in DC. Nationally, headquarters should continue to reflect western culture, life and needs in DC.



The BLM generates billions of dollars annually for local communities and western states and is the only natural resource agency that operates in the black generating billions into the Federal treasury. It is an amazingly efficient organization that manages 245 million acres of public estate and 700 million acres of public minerals while generating over \$5 Billion in revenues with a very small staff of 10,000 employees. The agency is national in nature and growing in its revenue generating capacity and public values across the nation. BLM headquarters is best located with the Secretary of the Interior in DC with a focus of national significance and growth - not an agency that should be placed under the influence of a single western state.

We also urge you to take a measured and cautious approach to any reorganization and assure that employees and the values of the Public Lands are not lost in the rush to meet political expediency. Experience over the decades has shown that reorganizations greatly detract from the purpose of, and take attention away from, the Department goals and can quickly remove workforce oxygen from an organization.

As other organizations have already stated so well to President Trump and Secretary Zinke, all agencies have suffered from a history of new Administrations making bold organizational changes in the name of "streamlining or improving government." But, invariably, the results have not lived up to the goals of change. Members of PLF have seen numerous proposed reorganizations from the USFS/BLM interchange, Service First, the MMS/BLM Merger, and numerous other proposed reorganizations that focused on eliminating one of the three "tiers" of the BLM field organization—the Headquarters, National Service Centers, State office, the Districts or the Field/Resource Area offices. We have seen one tier or another eliminated by one administration, just to be brought back again in the next administration because it is needed to do the work of the Federal Land Policy and Management Act (FLPMA) and public land management. None of these efforts manifested into increased efficiencies and certainly did not provide savings to tax payers. The primary evaluation factor in considering any changes to the BLM organizational structure should be "will the reorganization improve the delivery of cost-effective, efficient services needed to accomplish the BLM mission (including staffing, programs, and support functions) for the benefit of the public needs." Such decisions should be mission driven and public service results oriented.

There is always room for improved communications, coordination, collaboration and resource sharing (e.g., of specialized or technical staff) between Department of the Interior agencies at all levels. However, given the very different missions, regulations and policies of the respective DOI land management agencies, consolidating the respective agencies' chains-of-command at the "Regional Joint Management Areas" makes no sense at all. It is a recipe for ineffective and slower decision making, greater removal of local and place based interest involvement and participation, greater public confusion of who to work with and likely errors in the application of agency laws and policies, creating an open invitation to increased litigation.

Reorganizing is a normal reaction for each new administration where considerable energy, commotion and movement is expended with little effective progress towards improving management of the Public Lands. Because so many reorganizations have been tried before and did not work it is important for political leadership to specify the problems or issues to be addressed, find out why they are occurring and then consider the best options to resolve those.

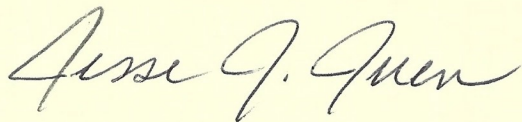


We request that the Department's political and professional leadership please consider the following issues:

1. Always be open and transparent with employees in the field offices and the public. Listen to them as they identify the short term and long term costs and issues associated with their daily jobs, their unique landscapes (land patterns, resources and publics), the economic and social needs of local rural communities and the regions' economies.
2. A reorganization that is driven from the top down, instead of the bottom up, will not meet the needs of the land, the public or the employees. It often fails because it doesn't adapt the specifics of the land, the landscape and the needs and economies of the local, state or regional communities.
3. Be aware of the importance of BLM's full mission to achieving your goals. FLPMA provides for management of both the renewable and nonrenewable values on the Public Lands, and these values cannot be separated through administrative shuffling of office locations.
4. Review the requirements of FLPMA associated with the multiple use and sustained yield management of the Public Lands and make sure these requirements are met by the reorganization.
5. Consider the safety of employees when making decisions far away from the field level when reorganizing. The three-tiered field organization has proven to be the most capable of fighting wildfires, protecting the public and public lands, providing for the safety of employees and the public in remote locations, and meeting the needs of local and regional communities and government.
6. Do not use the lack of capacity as the need to reorganize. These are separate issues that dictate very different solutions.

The PLF is a nonprofit national organization that supports keeping public lands in public hands, embracing multiple use management of the public lands managed by the BLM, as prescribed by FLPMA, and following sound environmental principles. We are a membership organization whose members are predominantly retired former employees of the BLM. As such, our membership represents a broad spectrum of knowledge and experience in public land management. We are uniquely situated as you proceed, to lend assistance with this task.

Sincerely,



Jesse J. Juen, President

Cc: Congressman Rob Bishop, Chairman House Committee on Natural Resources, 1324  
Longworth House Office Bldg. Washington D.C., 20515