



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

June 11, 2018

Delivered via email

Mr. Brian Steed, Deputy Director, Policy & Programs
Bureau of Land Management
1849 C Street NW, Room 5665
Washington, D.C. 20240

Dear Mr. Steed:

The Public Lands Foundation (PLF) recently submitted a statement for the record to the Senate Committee on Energy and Natural Resource, Subcommittee on Public Lands, Forests, and Mining for their oversight hearing on the BLM and Forest Service Law Enforcement Programs. PLF is very supportive of the BLM's law enforcement program and feels it is important to keep a viable and effective program for the protection of the resources, the BLM employees, and the public land using public.

Your testimony at the hearing indicated that the BLM is considering several changes to the program to improve performance and coordination with local law enforcement agencies. The PLF supports the efforts that the BLM is undertaking. Proper coordination between the local and Federal agencies is vital and benefits everyone by providing for mutual assistance in protecting the resource and people.

Until the 1990s, the BLM and USFS law enforcement staff worked for the "on-the-ground" BLM district manager or USFS district ranger. This provided the opportunity to work closely with the local elected Sheriff, state wildlife officers, state fire officials, US Fish and Wildlife Officers, Tribal governments, and other natural resource agencies. This changed with an organizational realignment of the BLM and USFS law enforcement functions within the agencies, under central direction from Washington, D.C. This change occurred for several reasons, however the result of this restructuring led, in some areas, to an unintended disconnect with local law enforcement communities and the agency field managers and impacted the ability of the law enforcement program to focus on the resource protection mission of the agencies. Over time, the reorganization of the agency law enforcement program also created several budgetary and enforcement effort conflicts with the agency field managers. The BLM and USFS managers' authorities are limited to their respective agency public lands and associated resources and emergency public safety.

Like any other BLM managed program, the law enforcement program works best when it is staffed and led as closely to the served communities as possible. Every management level of the agency, from the Secretary down to the field manager, should provide appropriate oversight of this important function. Law enforcement needs to be a part of

the resource mission of the agency and not a separate entity. Close coordination between the resource managers and law enforcement is necessary for this to be successful.

The PLF respectfully submits the following recommendations to the BLM for consideration for improvements to the Bureau's law enforcement programs. We are aware that many of these recommendations are already under consideration.

1. Reaffirm existing BLM law enforcement policy and function of uniformed patrol and Agent investigative staff. Clearly define oversight and day-to-day supervision of field law enforcement staffing. Enforce the priority of natural resource and visitor protection. Seek adequate and consistent funding to support ranger salaries and equipment.
2. Locate all field-level law enforcement staff in field station locations close to the communities they serve, as appropriate.
3. Encourage both field assigned law enforcement leads and state/regional supervisors to attend their respective scheduled staff meetings to review and coordinate law enforcement policies, priorities, and activities with local unit management.
4. Require law enforcement field staff to meet routinely with sheriffs in their areas of jurisdiction.
5. Encourage the creation of local Law Enforcement Councils (LECS) comprised of adjoining Sheriffs and field law enforcement staff, as noted by the Western States Sheriffs Association. Both Sheriff and BLM law enforcement should have a written and/or mutual understanding on the philosophy, method, and manner in which they treat the people they serve and protect the natural resources. Both county Sheriffs and the managers of Federal law enforcement agencies deserve a positive working relationship and open lines of communications. Clearly defined and agreed to roles between Sheriffs and Agency law enforcement staff must recognize the authority and responsibility of each organization.
6. As appropriate and where funding is available, continue or expand the use of law enforcement agreements (on a seasonal or long-term basis) with local law enforcement agencies, especially in locations where urban encroachment law enforcement problems are routinely occurring on adjacent BLM lands, such as homeless camping, on-going large groups of vehicles and partying, and indiscriminate firearms practice.

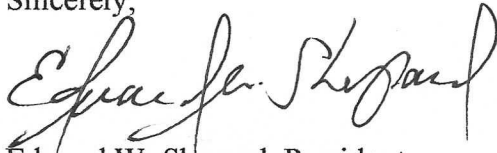
The BLM law enforcement staff are hardworking, dedicated employees and should be recognized for the good work that they do. There are simply more acres and more land users out there to be protected than the BLM has resources to allocate to protection. There are many examples of where federal and local law enforcement officers have backed each other up and worked well together; many more than examples of where they have not worked as well together as they should have.

We appreciate the BLM working to strengthen the law enforcement program and support efforts by the BLM to address law enforcement issues and improve coordination with local governments. Now is the time for the BLM Director and leadership from all federal land management agencies to take substantial steps to evaluate the proper role of law

enforcement and work to rebuild the relationships that have existed with local law enforcement in the past.

The PLF is a national nonprofit membership organization that advocates and works for the retention of America's Public Lands in public hands, professionally and sustainably managed for responsible use and enjoyment by American citizens. The PLF endorses and embraces the multiple use mission of the BLM. Members are predominately retired employees of the BLM from across the United States and as such have spent their careers dedicated to the sound management of these valuable lands and resources. Members have personal knowledge of these lands and resources and expertise in their management.

Sincerely,

A handwritten signature in cursive script, reading "Edward W. Shepard". The signature is written in dark ink and is positioned above the printed name.

Edward W. Shepard, President

cc: William Woody, Director, Office of Law Enforcement and Security

Richard Cardinale, Deputy Director for Operations