

Senator Lisa Murkowski, Chair  
Senate Committee on Appropriations  
Subcommittee on Interior, Environment &  
Related Agencies

Senator Tom Udall, Ranking Member  
Senate Committee on Appropriations  
Subcommittee on Interior, Environment & Related  
Agencies

Representative Betty McCollum, Chair  
House of Representatives Committee on  
Appropriations  
Subcommittee on Interior, Environment & Related  
Agencies

Representative David Joyce, Ranking Member  
House of Representatives Committee on  
Appropriations  
Subcommittee on Interior, Environment & Related  
Agencies

July 31, 2019

Dear Chairmen Murkowski and McCollum and Ranking Members Udall and Joyce:

We write with deep concern about the administration's reorganization of the Department of the Interior (DOI), the threat of which has become even more ominous with the announcement of the relocation of the Bureau of Land Management (BLM) headquarters and personnel. We commend language in the House of Representatives' FY20 Interior appropriations bill calling for strong oversight of DOI reorganization, and the many statements from appropriators and other members of Congress who share our concerns about reorganization. We urge you to take additional action on the misguided, unnecessary, disruptive effort to reorganize DOI and its impacts on resource protection, public employees and agencies charged with managing and conserving natural resources for current and future generations of Americans.

The reorganization process has occurred with minimum transparency, consultation or stakeholder involvement. Further, no clear justification has been provided for the many aspects of the DOI reorganization and the expenditure of scarce taxpayer dollars that could otherwise support the many ongoing needs for conservation work and other priority resource management.

**Given these and other concerns, we respectfully request that the conferenced FY20 Interior appropriations bill include legislative language preventing the reorganization, including specifically preventing any further relocation of staff. At a minimum, we ask that you use the bill, oversight hearings and other tools to provide strong oversight and regular opportunities for congressional and stakeholder involvement. Further, we urge that this and future bills do not allow relocation or any other aspects of a reorganization to lead to reductions in funding for agencies.**

We commend your work to date providing needed oversight of DOI reorganization in the House FY20 Interior appropriations bill and in your letters and oversight hearings. The administration is clearly seeking to avoid congressional oversight and engagement in this process. It is critical that Congress exercise its authority and responsibility to check the administration's efforts as part of the current appropriations process.

We recognize you may be pressed not to include these provisions in the conferenced legislation. Given this circumstance, we appreciate your consideration of our views.

Sincerely,

Coalition to Protect America's National Parks  
Defenders of Wildlife  
National Audubon Society  
National Parks Conservation Association

National Wildlife Federation  
Natural Resources Defense Council  
Public Lands Foundation  
The Wilderness Society

cc:

*Senator Joe Manchin, Ranking Member  
Senate Committee on Energy and Natural Resources*

*Senator Richard Shelby, Chair  
Senate Committee on Appropriations*

*Senator Patrick Leahy, Ranking Member  
Senate Committee on Appropriations*

*Representative Nita Lowey, Chair  
House of Representatives Committee on  
Appropriations*

*Representative Kay Granger, Ranking Member  
House of Representatives Committee on  
Appropriations*

*Representative Raúl Grijalva, Chair  
House of Representatives Committee on Natural  
Resources*

*Representative Rob Bishop, Ranking Member  
House of Representatives Committee on Natural  
Resources*

## **Attachment to letter to appropriators from a coalition of conservation groups regarding the BLM relocation and other aspects of the reorganization of the Department of the Interior**

July 31, 2019

Below we outline detailed concerns with the relocation of the Bureau of Land Management (BLM) headquarters and the broader DOI reorganization. We also provide staff contact information for further discussion.

**Relocation of BLM Headquarters and Leadership:** The fears we have had regarding the reorganization, and that we expressed to the administration early in the process, have been reinforced by the relocation of much of BLM's Washington, DC presence. We are concerned about a major balkanization of BLM across programs and states and that a relocation will make it increasingly difficult for BLM to do anything systematic at a regional or national level. Assistant Secretary Balash's recent letter to members of Congress only reinforces this fear with its reference to personnel with expertise in NEPA, who are critically needed to coordinate with leadership on major land use decisions. The movement of the BLM director and other senior leadership west, we fear, will mean a lack of coordination at a national level with other agencies, threatening land use decisions that impact sensitive BLM lands, wildlife and other resources under the management of—or of deep concern to—other DOI agencies. The move of senior staff also threatens to undermine the congressional oversight and coordination necessary to ensure conservation and science-based decision-making within BLM and across agencies.

**Relocation of staff:** We also fear the relocation will undermine SES and other career staff, who are already facing demoralization due to a pattern within the administration of undermining science, numerous remarks by DOI leadership undercutting staff, the broader administration effort to downsize the federal workforce, and rampant understaffing. Staff were not given sufficient consultation or notice such that many are now dismayed by major life decisions that must be made in short order. We expect some SES and other career staff will elect to leave the agency rather than move their families west, which raises major questions about whether those positions will be refilled and if so, if the personnel who replace them will have sufficient and relevant scientific expertise to ensure climate adaptation and other science-based decisions important for protecting land, water and air quality. These developments could reduce and shift the wealth of knowledge from backgrounds that seek to provide scientific integrity, despite the administration's efforts to compromise that integrity, to those that are more relevant to resource extraction and other uses that threaten the conservation of DOI landscapes and wildlife.

**Undermining of agency missions, lack of accountability to stakeholders, diversion of functions to states, and other concerns:** The very process of separating agency resources and directorates out of the headquarters apparatus will likely severely curtail public participation opportunities that are obligatory and essential to the BLM's ability to meet its complex mission requirements. The current concentration of key expertise in the headquarters system affords opportunities for stakeholders to access agency resources in a practical manner. It similarly affords BLM an ability to ensure that stakeholders are properly serviced given that stakeholders meetings can conveniently include multiple agency directorates and staff across the BLM, not to mention that other DOI programs can and often engage directly when such opportunities arise. Conversely, if a stakeholder was committed to conduct the same level of agency consultation under the proposed BLM relocation, that stakeholder would likely have to commit to substantial time and extensive travel, requiring the scheduling of multiple meetings across the entirety of the West, at considerable expense to such a stakeholder. In contrast to the current matrix, it is more likely that the only stakeholders that will be able to travel extensively to engage the multitude of directorates that will be scattered throughout the West will be industry voices.

One other challenge by the proposed reorganization relates to BLM's historical design, in which most of the BLM regional offices adhere to state boundaries. The BLM system is in juxtaposition to other land and wildlife resource agencies such as the Fish and Wildlife Service, the Bureau of Reclamation, and the U.S. Forest Service, the regional borders of which were designed around the boundaries of ecosystems and watersheds. The effect of

the BLM state office approach has often subjected BLM staff to additional regional political pressures from which other natural resources agencies are typically more insulated. By transferring resource directorates into the state system, the buffer from undue political influence will also certainly be lessened. With the transferring of BLM directorates directly into the state offices – such as the wildlife directorate, the recreation directorate, or the cultural resources directorate, to name a few – it is not apparent who will directly supervise transferred staff, and whether state directors will assume line authority over directorate staff and their agency mission. We are deeply concerned that these actions could mark the beginning of a gradual effort to dilute federal oversight of BLM lands and transfer management authority of public resources to the states, which would be extraordinarily damaging to the federal estate.

**Broader implications and impacts to staff:** The intended BLM move is not the camel's nose under the tent so much as its entire head and shoulders. We fear this is just the start of what could in a worst case scenario become a systematic dismantling of the conservation duties of DOI agencies through staff attrition, distraction and confusion, a shift to a focus on resource extraction across agencies, the forcing of political pressure on agency personnel, and the brushing aside of environmental responsibilities.

The BLM relocation raises questions about whether in time, the administration will seek to move other agencies west. Neither the FY19 spending plan submitted to appropriators nor Secretary Bernhardt's remarks to your committees outline such moves; however, this could conceivably be the first effort among many.

**Lack of transparency, justification and accountability:** The reorganization has from the beginning lacked transparency, and the administration continues to fall short in its responsibility to provide detailed plans for the relocation outlining the specifics of why exactly an effort of such magnitude should be undertaken at taxpayer expense, any cost-benefit analysis, a specific timeline, the exact problems to be solved, and how the various changes in the reorganization plan would correct these problems. For example, all other DOI agency leadership staff are based in Washington, DC, and more than 95% of BLM employees are already located in the West, so the chief rationale for the move is not justified. Reorganization moves including but not limited to BLM headquarters and staff relocation have also not been made with adequate consultation with stakeholders or the Congress, as you have observed on numerous occasions. There must be accountability to both Congress and other states.

The creation of unified regions also remains of deep concern in regard to the National Park Service and the US Fish and Wildlife Service. Two years into the reorganization, the exact justification for this huge shift in regional organization has not been outlined to Congress, or stakeholders such as the undersigned groups and membership we represent, in any level of detail other than the recycling of vague documents that accompanied the initiation of the proposal. It appears many agency personnel continue to have unanswered questions and that the administration is taking an approach of making it up as it goes along, providing vague directives that demonstrate a lack of understanding of agency operations and forcing career staff to be distracted from other duties to try to flesh out the details. This only further indicates that the effort is a solution in search of a problem, undermining staff morale while distracting from their other critical duties that are difficult to perform with insufficient staffing and other resources.

**Undermining of agency autonomy and science-based decision-making:** The reorganization threatens staff demoralization, displacement, and confusion across agencies. There remain many questions about the assignment of field special assistants, and there is no indication the administration is making any effort to answer these many questions. There is deep confusion over whether there is a need for these assistants and whether or not the creation of these roles just creates another layer of bureaucracy. It is unclear what are the specific roles of these personnel and what will be the frequency and degree of their involvement in agency decision-making. We are concerned about the potential for these personnel to undermine the conservation and science-based decision making of staff at the Fish and Wildlife Service and the National Park Service. These agencies have unique and specific missions, and departmental meddling in their decisions is inappropriate at best and dangerous at worst.

**Geographic connectivity of DOI lands:** This move to weaken BLM at a national level will be devastating to national parks, particularly in the West. BLM land is often adjacent to national parks; there is no hard border. National parks depend on compatible land management to retain ecosystem and cultural integrity. This compatibility has been ensured by the leadership presence of federal land management agencies in our nation's capital. The directors of federal land management agencies work together in DOI, and moving BLM to the West would make it far more difficult for these agencies to collaborate and ensure the continued protection and preservation of our national parks.

**Administrative functions:** We recognize that the effort to provide shared services to improve Human Resources, procurement and other back of the house functions may yield improvements. We urge Congress to ensure adequate oversight of these efforts. Otherwise, we are yet to see any good that could come out of the reorganization, and it only threatens to squander valuable taxpayer funds.

We welcome you to contact us with any questions or concerns or for further discussion regarding reorganization concerns for the following agencies.

**Bureau of Land Management concerns:**

Bobby McEnaney  
Natural Resources Defense Council  
[bmcenaney@nrdc.org](mailto:bmcenaney@nrdc.org)  
202.306.2260

Pete Nelson  
Defenders of Wildlife  
[pnelson@defenders.org](mailto:pnelson@defenders.org)  
406-556-2816

Phil Hanceford  
The Wilderness Society  
[phil\\_hanceford@twc.org](mailto:phil_hanceford@twc.org)  
303-225-4636

Edward W. Shepard, President  
Public Lands Foundation  
[sssstr1@comcast.net](mailto:sssstr1@comcast.net)  
(971) 832-3945

Nada Culver  
National Audubon Society  
[nada.culver@audubon.org](mailto:nada.culver@audubon.org)  
303-807-6918

**National Park Service concerns:**

Phil Francis  
Coalition to Protect America's National Parks  
[Phil\\_Francis@protectnps.org](mailto:Phil_Francis@protectnps.org)  
202-758-3936

John Garder  
National Parks Conservation Association  
[jgarder@npca.org](mailto:jgarder@npca.org)  
202-604-7386

**US Fish and Wildlife Service and U.S. Geological Survey concerns:**

Mark Salvo  
Defenders of Wildlife  
[msalvo@defenders.org](mailto:msalvo@defenders.org)  
202-772-0229