

**Testimony of Ed Shepard, President, Public Lands Foundation
United States House of Representatives
Committee on Natural Resources
September 10, 2019**

Thank you for the opportunity to present the Committee our views regarding the Department of the Interior reorganization plan to restructure and move the Headquarters office of the Bureau of Land Management (BLM). As a national, non-profit organization with more than 600 members, comprised principally of retired, but still dedicated, BLM employees, the Public Lands Foundation (PLF) has a unique body of experience, expertise and knowledge of public land management. The PLF is not political; our members have proudly served BLM Directors of both political parties so our perspective is based on decades of on-the-ground experience managing the nation's public lands.

While the BLM has encountered several calls for reorganization over more than seven decades, none has raised as much concern for us as this one. The PLF is strongly opposed to the BLM reorganization plan submitted to Congress on July 16, 2019. This plan would remove the BLM Headquarters staff and leadership in Washington, DC, from having a seat-at-the-table with other national agencies within the Department of the Interior. It would also severely weaken the BLM's ability to collaborate with other Federal agencies whose headquarters are located in Washington, DC in the development of policies and implementation of programs for all Americans in the management of our national public lands.

This plan is so radical that we question whether it was studied or analyzed by non-political budget analysts or organizational experts and whether career BLM senior management were involved or consulted. In short, we believe this plan would require the BLM to serve the short-term wants of locally powerful stakeholders to the detriment of all other constituents and the long-term needs of the public lands. The breakup of the Washington Office structure would ensure the BLM promotes parochial, local interests, rather than the national interest.

Most PLF members have experienced a variety of reorganization efforts. For the most part, these have proven to be counter-productive and costly to taxpayers. In the end, these previous efforts were found to be problematic and were ultimately reversed by the next administration. The PLF would ask that this reorganization plan be withdrawn.

Background

Organization

We fully believe this reorganization would functionally dismantle the BLM while ignoring the reality that the BLM is already a western-based agency with 97 percent of its staff in the field and a structure already in place that is responsive to western constituents

and stakeholders. Moving Headquarters employees to Grand Junction, Colorado and to several other locations across the west would not aid in the decision-making process and would hinder or eliminate the BLM's participation in legislative, budget, and policy discussions with the Department and Congress in Washington, DC. Today, the BLM is well organized to serve both western constituents and the Washington Office clientele. The relocation plan would result in programs and policies being fragmented and inconsistent among states and virtually all major policy decisions being made by the Department in Washington, DC. without the benefit of input from BLM career professionals.

Such a reorganization would also continue to increase the precipitous drop in the number of experienced BLM senior specialists and managers in Washington, DC, who have dedicated themselves to caring for and managing the nation's public lands and resources for the benefit of the American public and for current and future generations. Many of the people being directed to move have personal circumstances that give them no other option than to resign, retire or leave the agency. This drain of institutional expertise would have serious detrimental consequences for years to come for the management of the country's public lands and minerals.

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 current 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.

Local Decision-Making

The PLF strongly supports the delegation of authorities to BLM State Directors, District and Field Managers. These BLM 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.

In recent years, there has been reduced decision-making at the field level as a result of unprecedented involvement by the Department and other political appointees – not from BLM Headquarters. If the goal of this plan is to return decision-making to the local level, then we suggest that the Department return decision-making authority to local BLM managers who work daily with local communities. We also recommend that if the goal is to improve operational effectiveness, then the funds should instead be used to hire additional on-the-ground field staff across the west.

Leadership/Presence in Washington

The BLM Headquarters is currently located in Washington, DC. The Bureau Directors of all other Department of the Interior agencies and the U.S. Forest Service within the Department of Agriculture are also headquartered in Washington, DC. Like its sister agencies, the BLM has a significant presence in the east with some of the most significant natural gas development anywhere in the nation, notably in Louisiana and Arkansas. An agency without a strong leadership presence in Washington, DC, has no input into daily discussions regarding policy, budget, legislation and resolution of issues. This would quickly result in a very inefficient and inconsistent organization that would be forced to make decisions state-by-state, which may or may not be consistent or in the national interest. Alternatively, decisions would be elevated to the Secretary's Office, which would result in decisions being made with little-to-no agency input. Local stakeholder input, if any, would be reserved for those whose interests align only with prevailing political interests.

In fact, the reorganization plan would replace Washington, DC, where no single state has an advantage, with a headquarters office in Grand Junction giving a real advantage to Colorado. This would translate into inequities with other western states in terms of funding, program priorities, policy positions, and other management issues. Ultimately, this would result in poor and uneven management of the public lands across the west, where decisions would be weighted toward those states with particularly strong political ties, and to the detriment of the natural resources and the many constituents and stakeholders, who would lose their voices in how their public lands are managed.

Additionally, the decision to place some resource program staffs in specific states would tip the scales for that program's management in favor of the host state while fostering management by silo where each program would be distant – both geographically and policy-wise – from the BLM Headquarters office. This would again foster uneven and inconsistent management and encourage each resource program to act independent from the BLM as a whole.

Under this reorganization plan, the BLM could not ensure the management of our public lands for the “national interest,” as required by the Federal Land Policy and Management Act (FLPMA) of 1976. The BLM Headquarters staff and leadership would be removed from the federal government seat-of-power and placed in a remote location in the west with little influence in national public land issues.

Budget

We request that before Congress makes a decision on this reorganization you require an independent analysis by the Congressional Budget Office or Government Accountability Office of actual cost savings, if any. The cost savings purported by the reorganization plan have not been subject to rigorous analysis and do not recognize the significant long-term costs to the BLM. Taken together, these will adversely affect the BLM's ability to be one of the nation's leading revenue raisers. Currently, the BLM brings in more money

than it spends, making it one of the few agencies in government to do so. Factors that need to be considered include:

- Utilizing funds to move some 250 employees to western offices will reduce or eliminate relocation funds for several years. The best use of funds for employee moves are for rotating employees through out their career with the BLM among different duty stations, including Washington, DC. This exposes employees to a broad range of experiences and creates a highly skilled workforce for the future.
- Loss of experienced staff who will take new positions or retire because they are not in a position to relocate, exacerbating an already steep decline in experienced senior and highly skilled employees.
- Loss of productivity by staff during the disruption of the reorganization effort; the costs for replacement of staff who decide to leave during the reorganization; the costs of inefficiency from scattered Washington Office staff and managers and associated increase in travel costs to facilitate coordination; and the likelihood that the move to the west will be changed in the future and the BLM Headquarters Office would have to be reestablished in Washington.

Morale/Personnel

The reorganization plan will have a profound, disproportionate and negative impact on women and minority employees in the BLM Washington Office. The BLM Washington Office has made significant progress in the recruitment of women and minority employees into leadership and professional positions in the agency and many of these employees have indicated a move would create significant hardships. Some 40 percent of the headquarters staff has indicated a reluctance to move to the west at this time.

Conclusion

The reorganization plan suggests that the relocation of the BLM Headquarters staff and leadership is necessary to delegate more responsibility to the field, maximize services to the public, and increase BLM's presence close to the resources in the west. What this reorganization plan will do is sideline the BLM from any influence in national public lands policies in Washington, DC and hinder the multiple use, sustained yield mission on these public lands. We urge you to reject the plan or set it aside until a more thorough, independent study is conducted on the costs and benefits of such a plan.