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The Honorable Mike Crapo  
U.S. Senate  
239 Dirksen Senate Building  
Washington, DC 20510

The Honorable Jim Risch  
U.S. Senate  
483 Russell Senate Office Building  
Washington, DC 20510

The Honorable Mike Simpson  
U.S. House of Representatives  
2084 Rayburn HOB  
Washington, DC 20515

The Honorable Russ Fulcher  
U.S. House of Representatives  
1520 Longworth HOB  
Washington, DC 20515

September 25, 2019

Dear Senators and Representatives:

More than 11 million acres, or 22%, of the State of Idaho's acreage is managed by the Bureau of Land Management (BLM) under a multiple use and sustained yield mandate. Given the importance of BLM lands to Idahoans, I am writing to highlight the Idaho Conservation League's (ICL) concerns about the proposal underway to relocate key BLM staff outside of D.C.. ICL strongly recommends that the Congressional delegation suspend this process.

We represent 30,000 Idahoans who consider Idaho's public lands as an essential part of Idaho's very essence. Public lands define who we are. We regularly interact with other stakeholders who also rely on BLM lands for their livelihood and quality of life. These stakeholders include our partners in the Owyhee Initiative, mining companies, utilities, outfitters, permittees who graze sheep or cattle, mountain bikers, hikers and trail runners, OHV enthusiasts, botanists and bird

watchers, rock hounds, anglers, big game and bird hunters, recreational shooters, and people who just like going for a Sunday drive across Idaho's amazing open spaces.

These stakeholders often have different viewpoints and priorities, and they can have strong sentiments about how BLM land management could be improved. Depending on the focus of a particular administration, the BLM might be accused by some as standing for "The Bureau of Livestock and Mining" or by others as the "Bureau of Landscapes and Monuments." Both attributions hold kernels of truth, as the BLM has a complicated task of managing these lands for sometimes conflicting purposes.

This debate highlights the fact that stakeholders find value in these landscapes and rely on the BLM's engaged management of them. Many of the frustrations expressed are based on the fact that the BLM often does not have enough resources to properly manage these lands to best serve multiple uses while also minimizing conflicts. While ICL does not always agree with BLM management decisions, we appreciate having a forum to discuss these issues with professional BLM staff who are familiar with particular issues as well as the relevant ecological, economic and social context.

Not everyone in Washington is aware of how important Idaho's rangelands are to Idahoans. As such, it can be hard for stakeholders to get the ear of decision-makers given the competing needs from other agencies and interests. As such, Idahoans need strong voices back in D.C. in the form of career BLM professionals who can advocate for the lands and the stakeholders.

While the idea of "moving decision makers closer to the people they serve" sounds good, 97% of BLM employees already work outside of D.C. This proposed move is like moving the bus driver from the driver's seat to the middle of the bus. In this scenario, you can't really see where you are going, can't figure out how to navigate traffic and can't even reach the turn signals to tell others which way you're turning. Without a steady hand on the steering wheel, the BLM bus is likely to hit more potholes, run into ditches and get left behind during budget discussions. Meanwhile, western communities, stakeholders and invaluable public resources that BLM serves will suffer.

We ask you to take a deeper look into how this move will affect Idahoans and the public lands we, your constituents, rely on. Here are some issues we ask you to consider:

- Regarding responsible livestock management, BLM range cons monitor allotment conditions and track trends in rangeland health. How would the move affect the availability of range cons or affect the time needed to renew permits, and make responsible and legally defensible decisions?
- Sage-grouse populations in Idaho have recently plunged by 25%. Improving habitat and addressing threats posed by uncharacteristic wildfires and invasive species are critical to keep sage-grouse from requiring Endangered Species Act protections. More BLM resource specialists and staff are needed to analyze, implement and monitor expanded juniper treatments and fuel breaks. How will this move affect the BLM's efforts to do this important work?

- If sage-grouse populations continue to decline, will the BLM be able to effectively communicate its adaptive management strategy to the U.S. Fish and Wildlife Service leadership back in D.C. who may be moving toward a listing decision?
- The BLM also manages the mineral estate of leasable and hardrock mining claims. Mining companies are working to improve mine plans to avoid, minimize and mitigate environmental impacts. However, there are still too many examples of planning and operational failures that created permanent pollution problems for downstream communities and unfair burdens on taxpayers. How will this move affect the BLM's ability to conduct the environmental review process to provide more certainty for the companies and the environment?
- Regarding Idaho's iconic big game, DOI Secretarial Order 3362, *Improving Habitat Quality in Western Big-Game Winter Range and Migration Corridors*, directs the BLM to enhance and improve the quality of big-game winter range and migration corridor habitat. BLM staff are working with sportsmen/women organizations and state agencies on site-specific management activities to both conserve big-game habitat and protect public safety by preventing vehicle-animal collisions. How will this move affect Idaho's wildlife and public safety?
- The BLM has a good track record of coordinating with other agencies such as the National Resource Conservation Service, the Forest Service, the USGS and state agencies on tracking trends across multiple ownerships and leveraging resources to benefit stakeholders. Will some of these programs fall by the wayside and, if so, what will be the increased costs for the other agencies?

These are but a few examples of how important BLM lands are to Idahoans. In order to have good management, we need to have good managers and they need *additional* tools, resources and support to do their jobs, not fewer. **Successful management of these issues requires continued, active involvement of BLM professionals in DC.**

While the currently proposed Senate bill does not include funding for the move, the administration may use unobligated 2019 funding to accomplish the move, or proceed via funding provided by withholding employee incentives. However, the House bill specifically prohibits funds from being used to accomplish this move. **As the Senate and House meet to conference these bills, we recommend adding the House prohibition in any final bill.**

If the true goal is to improve management of BLM lands and place BLM leadership and staff closer to stakeholders and the resources, there are a number of other steps that could be taken. For one, Congress could appropriate funding at levels that enable the agency to properly manage these lands for the benefit of the public.

Additionally, the administration could reinvest in and properly support the Resource Advisory Council (RAC) program. I served on the Boise District RAC for many years and RACs serve as a critical line of communication among local stakeholders and the BLM. The Boise District RAC

used to hold 4+ meetings a year; however, it had just one meeting in the last two years. Two RAC members I served with have stated that they are considering leaving the RAC as the administration does not seem to value their perspectives. Instead of addressing this concern, the proposal to move critical BLM staff out west has only reaffirmed this opinion.

With 97% of BLM staff already out west, it is critical to keep the remaining experienced public servants stationed in D.C. to speak up for the intrinsic value of our public lands and the communities that rely upon them.

Thank you for consideration of this matter.

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A handwritten signature in black ink that reads "John Robison". The signature is written in a cursive style with a large, looping initial "J".

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Idaho Conservation League  
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