

## **Public Lands Foundation**

### **Maintaining the Bureau of Land Management Headquarters in Washington, D.C.**

**July 2019**

#### **Issue**

The Department of the Interior (DOI) is planning to move the headquarters (HQ) of the Bureau of Land Management (BLM) to Grand Junction, Colorado, and scatter staff and leadership to several western states.

#### **PLF Position**

The rationale for moving the current BLM HQ from Washington, D.C. to the West includes reasons such as:

- placing decision-making closer to the ground,
- making it easier for western constituents and stakeholders to meet with HQ officials,
- increasing the western culture of BLM HQ employees, and
- making the agency more responsive to the needs of western constituents.

There are no data or cost-benefit analyses identifying the above as problems that need to be solved. In fact, nearly all (97 percent) of the BLM employees are located in western offices and have been delegated authority to make land use decisions as they weigh public interest, resource conditions, cooperating agency concerns, and BLM policy.

The Public Lands Foundation (PLF) strongly believes the BLM HQ should be located in the Washington, D. C. area to provide immediate and efficient support to the Department, Administration, Congress, Office of Management and Budget (OMB), and other closely aligned Federal agencies. The National-level leadership of the BLM should be available in the Washington, D.C. area to meet with National organizations, such as the National Association of Counties, various Non-Governmental Organizations (NGOs), professional associations, industry associations, etc. that have their offices in the Washington, D.C. area. BLM leaders should also be available to meet with state and local government officials that are visiting the Nation's Capital to meet with their Congressional delegations and Department officials.

A very small percentage (3 percent) of the BLM total workforce is currently located in the Washington Office providing budget, policy, oversight support, and expertise to the BLM

directorate and the Department. These program leads and subject-matter-experts, as well as the entire Directorate, should remain in Washington, D.C.

Nearly all of the BLM employees are western-based and are delegated substantial authority to make land use decisions. This decentralized alignment of personnel allows for efficient and timely response to western constituents. There is nothing to be gained and much to be lost by spreading the HQ functions of policy and oversight across several locations in the West.

The BLM HQ is best located in close proximity to the Secretary of the Interior, the Department staff, other Federal agency senior staff, Congressional staff and National stakeholder organizations to effectively focus on National issues. Moving the employees in the HQ to a single western location will not aid in the decision-making process and will hinder or eliminate the BLM's participation in legislative, budget, and policy discussions with the Department and Congress in Washington, D.C. Today, the BLM is well organized to serve both the Washington, D.C. clientele and the western constituents. BLM manages public lands for all Americans. The proposed relocation will result in programs and policies being fragmented and inconsistent between states, or virtually all decisions being made in Washington, D.C. without the benefit of input from career professionals.

There are some decisions where the delegation of authority is held in the Department, such as publishing notice of realty actions in the Federal Register. This and other actions could be delegated to the already in place western managers immediately. This action alone will speed up the completion of various transactions requiring no employee moves or organizational modifications.

Utilizing funds to move 300 employees to western offices will reduce or eliminate relocation funds for several years. The best use of funds for employee moves are for transferring employees among different duty stations, including Washington, D.C. This exposes employees to a broad range of situations and creates a highly skilled workforce.

PLF sent a letter to the Secretary on June 14, 2017 and provided testimony to Congress on December 7, 2017 regarding a proposed Headquarters office relocation. However, at those times, what we thought we were addressing was a wholesale move of the entire Washington Office to one location. The July 2019 proposal is substantially different.

## **Background**

It is important to recognize that the BLM has been managing public lands with employees located throughout the West since its creation in 1946. The BLM's predecessor agencies, the General Land Office and the Grazing Service, also based nearly all of their employees in western locations called Districts. The BLM is unlike other Federal agencies and Commissions whose employees are all located in Washington, D.C. and large regional offices. The BLM has offices in approximately 120 towns throughout the West. These employees are located in twelve State Offices, District Offices, Field Offices, the National Operations Center in Lakewood, CO, the National Training Center in Phoenix, AZ, and

the National Interagency Fire Center in Boise, ID. All offices are delegated substantial authority for authorizing actions on the ground, managing firefighting logistics, and assuring that all operational needs are met to accomplish these activities in accordance with multiple use objectives outlined in local land use plans. They are responsible for coordinating actions with units of Federal, State, and local government. They conduct tribal consultations and coordinate activities with land owners and user groups. These actions on the ground range from administering grazing permits to harvesting timber and authorizing rights-of-way for power lines and roads. They also include managing wild horses, wilderness, and recreation permits. Issuing leases and permits to drill for oil and gas and approval of mine plans are also their responsibility. These are just a few of the many responsibilities of the western based staffs who are responsible for managing public lands for multiple use.

The function of the BLM HQ is to provide National leadership and oversight of the BLM's mission and mandates. This includes such functions as National policy and budget development, fiscal and program accountability, development and review of legislative proposals, writing regulations, preparing and presenting testimony for Congressional hearings, and coordination with other departments and agencies on issues related to National policies. They are normally not involved in the operational actions described above that are handled by the western offices unless there are unprecedented national issues involved. Additionally, BLM HQ staff attend numerous impromptu meetings with the Director, the Secretary's office, Congressional offices, OMB, and other agencies to discuss various policy and procedural issues. These Congressional, governmental, and NGO entities are all located in Washington, D.C., therefore, the BLM Directorate and staff of program experts are also located in Washington, D.C. Failure to maintain BLM HQ staff in Washington, D.C. will result in the exclusion of the BLM from these day-to-day discussions. (See Attachment 1 for a brief description of the current BLM organization). Furthermore, it is unlikely that these organizations will want to expend money to travel to a relocated BLM headquarters in Grand Junction.

## **Discussion**

The organization currently in place for the BLM has evolved over 100 years, going back to the structures used by the General Land Office and Grazing Service of placing leadership positions in Washington, D.C. while having operating offices in the West to serve the local constituencies and stakeholders. This works well for the BLM and the need has not changed. Although there have been drastic changes in the speed of communications brought about by technology, there still is a need for the BLM to have a presence in Washington, D.C. to manage the day-to-day political, budget, policy, oversight, and to coordinate with congressional, departmental, and other agency staff. It is vital for the relevancy of the BLM and the efficient management of the public lands that this HQ directorate and staff remain in Washington, D.C.

The perception that most BLM decisions are made in the Washington Office, far removed from local communities, local interests, and the States, is simply not based on the facts and should not be used to justify a move of the BLM HQ to the West or further reallocation of

Washington Office staff to the West. The BLM is already a decentralized organization with a presence in every western State. The BLM Field and State Offices, including the BLM State Directors as Senior Executive leaders of the agency, are already the “boots on the ground” and the points of contact with local communities, local interests and the States. These BLM field managers, not BLM HQ managers, are the delegated decision-makers for public land actions.

Following are the significant negative issues that will be created by fragmenting BLM HQ across many different locations:

- Colorado will have a real or perceived advantage over the other western states for funding, positions, policy leanings, etc.
- Other states will have advantages in individual programs such as rangelands in Idaho, Cultural in New Mexico, Oil and Gas in New Mexico, Coal in Wyoming, Lands and Realty in California and Hard Rock minerals in Nevada.
- Other programs such as Wildlife, National Conservation Lands and Planning will be fragmented across several states.
- The daily in-person interaction and coordination with DOI officials, White House staff, Congressional members and staff, and other governmental and non-governmental entities will be very limited leaving the agency with little or no legislative or policy input.
- The functions remaining in Washington, D.C., such as budget, legislative affairs and FOIA, will not have immediate and close access to programmatic information and subject-matter-experts they need to accurately respond to the Hill, the Secretary’s Office or a variety of national constituencies.
- Effective interdisciplinary coordination among multiple resource specialists facilitated by co-location and “down-the-hall” proximity will not be possible if those specialists are scattered among several western states.
- The preparation of land use plans in accordance with the principles of multiple use and sustained yield, as mandated by the Federal Land Policy and Management Act, and using a systematic interdisciplinary approach, will be made extremely difficult with program leads scattered among several western states.
- The required coordination and consultation with Departmental and Congressional entities for oil and gas production, mineral leasing, rights-of-way for major energy projects, land withdrawals and designations, grazing, etc., will be much more difficult with the placement of knowledgeable staff throughout the West.
- Many current field managers and State Directors have had one to several Headquarters office duty tours. Under this proposed reorganization, these

Washington, D.C. duty tours will end. This will deny future BLM managers and executives valuable participation in Hill briefings, D.C-based meetings with NGO and industry constituencies, and interaction with the Department of the Interior Assistant Secretary and senior staff levels. Thus managerial effectiveness out west at collaborating with users, state, tribal and local stakeholders will be marginalized by the elimination of the national perspective gained working in Washington, D.C.

- With the exception of Grand Junction, Colorado, anyone visiting the Directorate will still be traveling. Accessing many western towns is at least as time consuming and costly for travelers than Washington, D.C., if not more so. There is no guarantee that travel to a western location would be nonstop from other western cities.
- The transfer of professional staff to locations throughout the West will destroy the career, non-political professionalism of the BLM for which it has been known.
- The cost of moving some 300 BLM employees and securing a facility to house them is significant, diminishing operational funds for the western offices.
- The morale of those employees will be significantly impacted.

The Department could enhance BLM decision-making, streamline and improve efficiencies, and improve customer service, by relinquishing control over some of the extraordinary and unnecessary reviews and oversight that have grown over the years with each successive Administration. For example, BLM State Directors should be able to issue routine Notices of Realty Action and simple Federal Register Notices without the burdensome review and approval currently required by the BLM HQ and the Department. This simple change alone would result in substantial improvement in efficiencies.

## Attachment 1

### **Current BLM Organization**

The BLM HQ is located in Washington, D.C. attached to the Department of the Interior by a Presidentially-appointed and Senate-approved Director. Reporting to the Director are a Deputy Director of Policy and Programs, a Deputy Director of Operations, seven Assistant Directors managing the major function groups of the BLM, a Director of Law Enforcement and Security, and a Director of the National Operation Center located in Denver, CO. The Assistant Directors are located in Washington, D.C. with the sole exception of the Assistant Director of Fire and Aviation who is located at the National Interagency Fire Center in Boise, ID. Assistant directorates are further organized into divisions and branches to oversee the many programs the BLM is charged with managing.

The BLM established State Offices in each of the twelve western states having large acreages of public lands and Federal mineral estate. There is an Eastern States Office (currently located in Washington, D.C.) overseeing 31 states east of the Mississippi River. State Offices are located in Anchorage, AK; Phoenix, AZ; Sacramento, CA; Denver, CO; Boise, ID; Billings, MT; Reno, NV; Santé Fe, NM; Portland, OR; Salt Lake City, UT; and Cheyenne, WY. Each state office is directed by a State Director who is a member of the Senior Executive Service, an Associate State Director, and three to four Deputy State Directors managing the various functions of the agency. The state offices are located to place them close to state governments, tribal governments, and stakeholders within the state or region.

Each state office oversees the on-the-ground management though District Offices managed by District Managers and located in towns close to where the BLM-managed public lands are located and local government and stakeholders reside. Districts are further divided into one or more Field Offices. The State Directors are delegated full authority to implement the programs within their state(s) and the District and Field Managers are delegated the authorities to implement plans and projects within their jurisdictions; according to applicable laws, regulations, and policies. All told, there are more than 200 local BLM offices that work with state and local governments, tribal governments, non-governmental organizations and citizens.