United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

JUL 16 2019

The Honorable Betty McCollum
Chair, Subcommittee on Interior and Environment
Committee on Appropriations
U.S. House of Representatives
Washington, D.C. 20515

Dear Chair McCollum:

Consistent with the Committee's report language to notify you thirty days before we obligate the funds Congress provided for the reorganization, the Department of the Interior provided written notification of these actions on May 8, 2019, and on June 11 provided a more detailed briefing on that notification. In addition, Secretary of the Interior David Bernhardt committed to you during his appearance before your subcommittee that he would provide you with additional information on the Bureau of Land Management's realignment of resources to the West at the appropriate time. I am pleased to now provide you with the following information on this matter.

Background

In May of 1937, Congress formally created the position of the Deputy Secretary (then Under Secretary) of the Department of the Interior. Records detailing the Senate's consideration of this position in 1936 reveal the understanding of the importance of ensuring that senior leadership, including the Secretary of the Interior, would have an increased presence in the Western United States. Emphasis was placed on the need to align the Department's personnel footprint and resources with its physical footprint and resources, which continue to be primarily based in the West.

Realigning Departmental human resources closer to the lands and resources it manages has been of significant interest not only to Congress, but also its constituency of states, tribes, and local communities. Bipartisan support illustrates a number of significant benefits, ranging from more informed decision-making to increased efficiency and coordination among stakeholders and the Department's agencies.

The BLM has thoroughly assessed its existing footprint and operations in Washington, D.C., and the immediate needs of its State Offices across the West to determine the best approach for a meaningful reorganization. From the early stages of the BLM reorganization effort, consistent with feedback from a broad range of states and partners, the BLM has committed that the State Office structure will be maintained. This proposal not only maintains that structure but serves to strengthen the Bureau's organization at the state level even further.

As Secretary Bernhardt has observed, a meaningful reorganization is not simply about where functions are performed; rather, it is rooted in how changes will better satisfy the needs of the American people. Time and time again, the Secretary has received feedback from Members of Congress, Governors, local officials, and citizens closest to the resources that their BLM State, District, or Field Office is understaffed or lacks resources to support the needs of their constituents. Under our proposal, every Western State will gain additional staff resources. This approach will play an invaluable role in serving the American people more efficiently and advancing the BLM's multiple-use, sustained yield mission.

Summary

The Secretary spent considerable time and effort in reviewing the facts and assessing varying options. As a result of this effort, the Secretary determined the proposed approach should achieve the following objectives:

- Delegating more responsibility down to the field;
- Maximizing services to the American people; and
- Increasing the BLM's presence closest to the resources the BLM staff manages.

These objectives are to be achieved through the following actions:

- Maintaining the necessary core D.C. based functions in Washington, D.C.;
- Optimizing the efficiency of some headquarters positions currently based in Washington, D.C. by relocating them to the State Offices across the West that their work supports;
- Allocating certain positions to State Offices to perform State Office functions;
- Establishing a BLM Headquarters in Grand Junction, Colorado.

Each position currently performing headquarters-specific functions both in Washington, D.C. and in the field was assessed and analyzed. A total of 550 positions were evaluated. Of those, 166 headquarters positions are already assigned to locations in the field – this includes positions such as Special Agents, who are part of the BLM's Office of Law Enforcement and Security directorate, and Horse Wranglers, who are part of the Wild Horse and Burro Program. Of the total 550 positions, 74 will be allocated to the BLM State Offices, leaving 476 positions performing headquarters duties.

Under the BLM's implementation plan, the Deputy Director of Policy and Programs will remain in Washington, D.C., along with 60 staff who will continue to perform functions in the Main Interior Building that are inherently and logically located in Washington. For example, the Bureau's staff who directly inform and perform duties tied to its budgetary responsibilities will continue to remain in Washington, as will staff performing functions in its Legislative Affairs, Regulatory Affairs, Public Affairs, and Freedom of Information Act divisions.

Two hundred and twenty-two positions currently performing headquarters duties in Washington, D.C., will continue to accomplish these functions while being based in locations throughout the BLM's western regions and landscapes in order to optimize the BLM's presence where the needs are greatest. In consultation and coordination with each of the Assistant Directors, we thoroughly

assessed the duties and responsibilities, reviewed the current duty stations, considered appropriate western locations and the benefits and challenges of a potential relocation for each of these 222 positions. These relocations will improve the BLM's headquarters operations on a state-by-state basis and will enhance coordination with its constituencies.

For instance, the BLM will assign staff in the rangeland management program to Idaho, which our analysis revealed to be disproportionately understaffed relative to their mission. Further, renewable energy program staff will be assigned to states such as California, where a number of solar, wind, and geothermal projects are in process, and where we can foreseeably anticipate that this type of workload will continue. The chart below details the proposed assignments of positions by location and program (directorate), including the above mentioned 74 positions.

	D.C. Location [1]	Grand Junction Location		AK	AZ	CA	CO	ES[2]	ID	MT	NV	NM	OR	UT	WY	Field Total
Director's Staff	3	8														
EEO		1			7											7
Director's Office Subtotal	3	9														
Law Enforcement & Security	1													3		3
Resources & Planning	1	4			1		23		14		5		2	11		56
Energy, Minerals & Realty Management	3	3			3	9	4				12	19		3	5	55
National Conservation Lands and Community Partnerships	1	3					1				8	13		10		32
Communications	22	3				3	1				7			10		21
Human Capital Management	2	3			23											23

[1] D.C. Location refers to the Main Interior Building.
[2] ES stands for the Eastern States Office of the BLM.

Business, Fiscal and Information Resources Management	28	2					25									25
Subtotal	**61**	**27**														222
Positions to be Allocated to State Offices	0	0		4	5	8	4	2	4	3	17	7	3	7	10	74
State Totals				**4**	**39**	**20**	**58**	**2**	**18**	**3**	**49**	**39**	**5**	**44**	**15**	**296**

Given the need for additional technical experience in the field, the Bureau will allocate 74 headquarters positions, some of which have been vacant and unfilled for several years, to perform critical duties closer to the Bureau's resources in its State Offices. The resources available for these positions will be realigned to the budgets of the appropriate State Office, to which they will report, to address immediate needs and priorities. For example, the BLM proposes dispersing additional planning and environmental analyst resources, which formerly performed key functions for National Environmental Policy Act (NEPA) reviews at headquarters, to states with environmental analyses in process, ranging from Colorado to Oregon. Given that under Secretary's Order 3355[3] the responsibility for this work has shifted to BLM State Directors, these resources are now more appropriately allocated to State Offices. As discussed below, these particular positions are being allocated based on direct consultation with State Directors on their staffing necessities.

Lastly, the BLM Director, Deputy Director of Operations, Assistant Directors, and a few selected members of their staffs, totaling 27 positions, will be located in Grand Junction, Colorado, as part of an initiative to establish the Headquarters.

As it stands, nearly half of the Bureau's Senior Executive Service (SES) leadership is currently based in Washington, D.C., despite the fact that their functions and operations are overwhelmingly carried out in the West. In particular, the BLM's Assistant Directors, who provide policy guidance, program oversight, and assistance on audits and evaluations for their respective national programs, are all currently based in Washington, D.C. The relocation of these leadership positions will significantly benefit the Bureau's day-to-day operations. The positive returns will be realized in cost (e.g. lower office lease costs and locality pay costs) and time savings; enhanced coordination with employees, external partners, and stakeholders; and more informed and improved decision-making based on on-the-ground experience.

For example, locality adjustment rates for western locations range from 15.67 percent to 26.30 percent. The salary net present savings for an employee at a General Schedule (GS) pay scale,

[3] Secretary's Order 3355, Streamlining National Environmental Policy Act Reviews and Implementation of Executive Order 13807, "Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure Projects," and the April 2018 Deputy Secretary Memorandum, specifically establishes that the Senior Executive Service (SES) member with line authority over the proposed action and lead SES attorney bear responsibility for NEPA documents.

grade 12, in a State Office compared to the Washington, D.C. locality ranges from $33,764 to $173,808. At a net present value, the payback will exceed $50 million. These savings extend to both the Headquarters and State Offices where employees will be relocated and aligned. Ultimately, a Headquarters in the West will maximize services to the American people while increasing the BLM's presence closest to the resources it manages.

Implementation of the FY 2019 spend plan will utilize the $5.6 million funding allocation for FY 2019. The initial relocation of approximately 27 employees to the BLM's Headquarters will be achieved through voluntary reassignments, providing commitments are secured by August 15, 2019. Once there is a commitment, the Bureau would issue the employee transfer orders, which will allow employees to work with the agency travel office to estimate moving costs and obligate the necessary funds for the permanent change of station (PCS). Positions that are currently vacant will be advertised in Grand Junction. Directed reassignments will capture the balance of positions that will establish the Headquarters.

The remaining positions will be relocated to their newly assigned locations under the various State Offices following a similar method. Voluntary reassignments will be made as State Directors identify space and funds remain available for PCS costs. Currently vacant positions will be advertised in their respective locations. Implementation of relocations and realignments will take place over the next 15 months until the BLM's M Street Office lease expires at the end of calendar year 2020.

The discussion below provides more detailed information related to the BLM's operations and functions, the need and rationale for the reorganization, and is followed by an analysis of how each state will benefit from the BLM's reorganization.

The BLM's Western Footprint

Almost all of the BLM's operations and functions are located in the Western United States. Table 1 illustrates this fact by examining the percentage of current BLM activities that occur in the West versus the Eastern United States.

TABLE 1. Selected BLM Statistics Comparing Activities in the West

	Western States		Eastern States	
	Number	% of Total	Number	% of Total
BLM FTEs (FY19)	8,690	93%	677	7%
Senior Executive Service	13	54%	11	46%

GS-15	31	39%	48	61%
GS-14	144	54%	121	46%
Recreational use of BLM lands (visits, FY18)	67.9M	99.7%	0.2M	0.3%
Grazing permits and leases in force (as of May 2019)	17,864	100%	0	0%
Wild horse and burro populations on public lands managed by BLM (March 2019)	87,885	100%	0	0%

Despite the majority of the BLM's personnel and programs being located in the Western United States, a disparate number of senior level officials and policymakers are currently located in Washington, D.C. As referenced above, nearly half of the 24 SES employees working at the BLM are based in Washington, D.C. This includes the Director, the Deputy Director of Policy and Programs, the Deputy Director of Operations, and the Assistant Directors that lead the following divisions of BLM:

- Office of Law Enforcement and Security
- Resources and Planning
- Energy, Minerals, and Realty Management
- National Conservation Lands and Community Partnerships
- Communications
- Human Capital Management
- Business Fiscal and Information Resources Management

Each of these positions oversees a variety of programs and is primarily responsible for the creation and establishment of national policies consistent with the Federal Land Management and Policy Act (FLPMA), which directly impacts the day-to-day operations of BLM staff, particularly those in the West.

Additionally, a number of other senior leadership positions, such as Deputy Assistant Directors and Program Leads, are located in Washington, D.C. This translates to over 60 percent of the 79 current GS-15 positions and nearly half of the 265 GS-14 positions being located in Washington, D.C. These senior positions have a disproportionate influence on agency decision making and policy setting. With such large numbers of senior leadership located in D.C., policy direction often comes from individuals who have very little interaction with the constituents, and the land itself, that are most impacted by BLM policies.

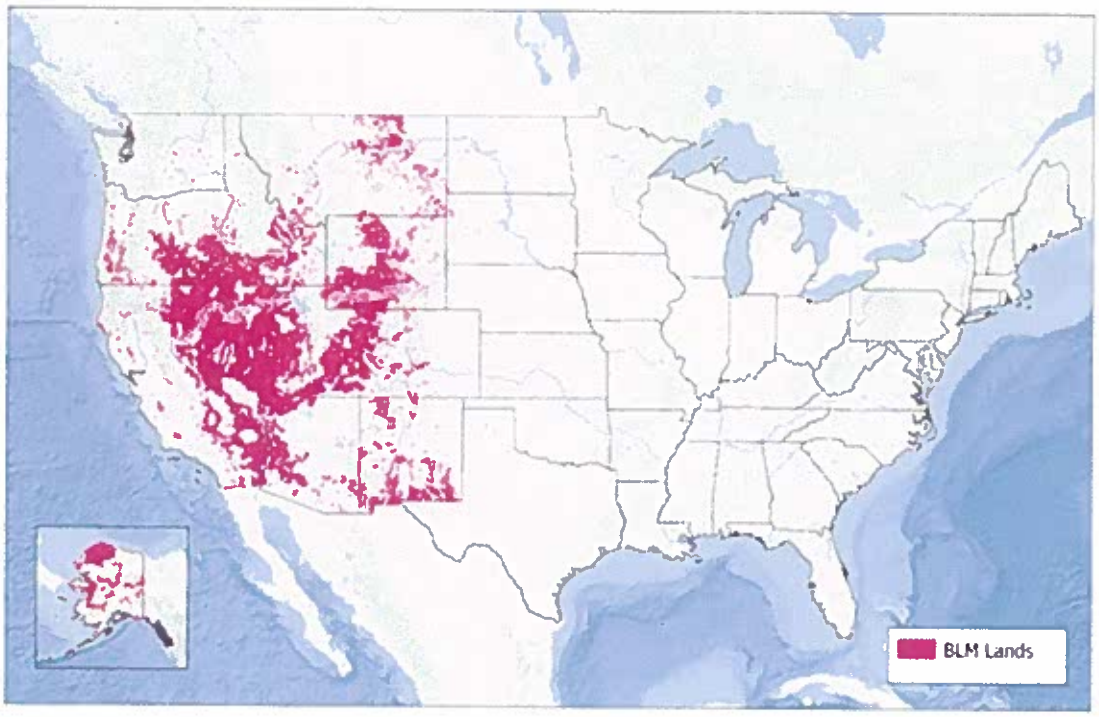

FIGURE 1. Distribution of BLM managed surface lands across the United States (shaded areas).

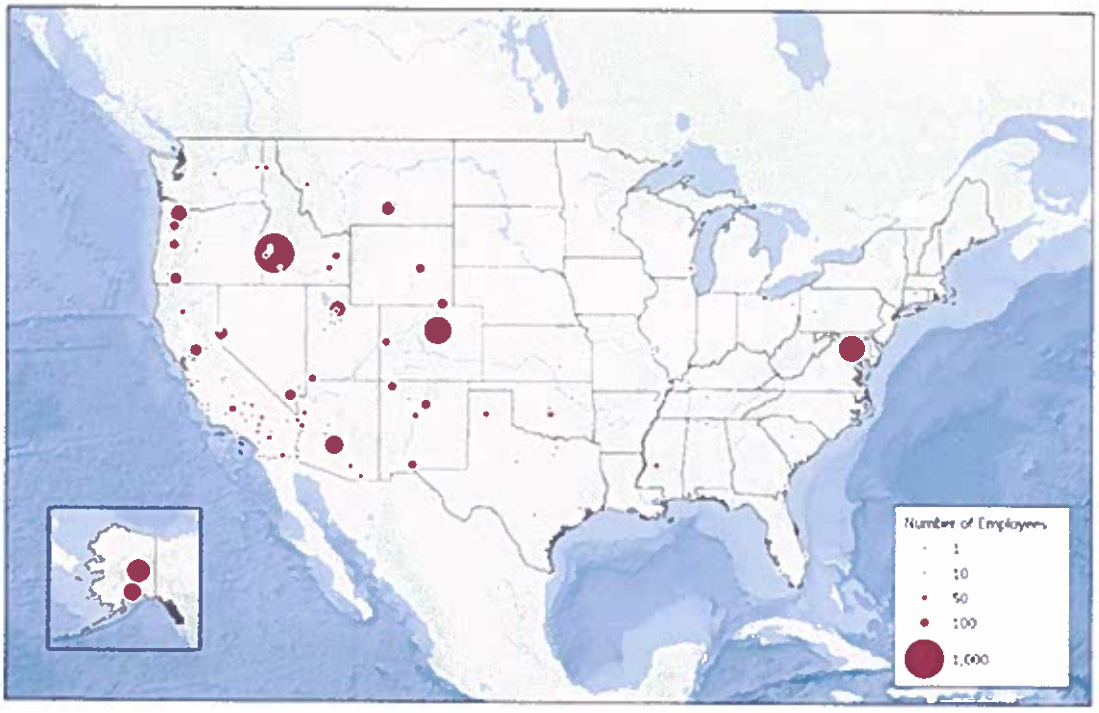

FIGURE 2. Distribution of BLM employee locations across the United States. BLM employees are concentrated in the Western portion of the U.S. Approximately 649 BLM employees are currently located in, or aligned with the Washington, D.C. office, although this number includes some individuals classified as remote workers. Larger circles on the map indicate greater numbers of BLM employees (e.g., Anchorage, Boise, Denver).

The Benefits of Relocation to the West

A. Enhanced Management, Oversight, and Communication

The relocation of staff to State Offices and leadership to a Headquarters in the West will strengthen the Bureau's organizational effectiveness in order to better achieve its multiple-use, sustained yield mission under FLPMA. This relocation provides numerous benefits, including:

1. Executive personnel are physically closer to the geography they manage, enabling closer oversight and accountability for the BLM's activities and decisions, including field or site visits for high priority and/or controversial projects so managers can gain a more fulsome understanding of what is being proposed on the ground.
2. Senior, seasoned staff are enabled to mentor and train future leaders of the Bureau through consistent interaction and guidance.
3. It facilitates more frequent, face-to-face communication among leadership and bureau staff, partners, and stakeholders.
4. It maximizes administrative efficiencies through potential shared services and other collaborative actions are maximized.
5. It concentrates a greater proportion of BLM staff in a time zone closer to the areas wherein the agency primarily operates, aligning working hours and improving communication.

B. Improved Customer Service and Partner/Stakeholder Engagement

Currently, required travel creates a burden for BLM stakeholders to interact directly with BLM executives. Closer physical proximity of BLM leadership to bureau stakeholders and constituents will improve bureau operations and decision-making. Strong relationships with Western States, communities, and other partners in states and regions are important for effective communication. Relocation improves stakeholder engagement by:

1. Facilitating relationship-building with partners through frequent and meaningful engagement.
2. Fostering better understanding of the Western communities served by the Bureau of Land Management.
3. Allowing problem solving to occur earlier in the decision-making process and facilitating better outcomes when a complex decision or problem arises.

C. Increased Functionality

The vast majority of the functions the BLM performs are located in the Western U.S. These include many of its highest priority programs. The agency's firefighting operations long ago decided that moving its operations West would provide increased effectiveness in fire preparedness and suppression. However, it was not until the 2000s that the BLM relocated its Assistant Director, Deputy Assistant Directors, and staff for the Fire and Aviation program to the National Interagency Fire Center (NIFC), the nation's support center for wildland firefighting,

located in Boise, Idaho. That move has proven to have been both wise and successful. NIFC's model allows various agencies to jointly coordinate to address wildfires across the country, and the BLM's physical representation on-site has been beneficial for not only the swift deployment of resources to the field, but also more efficient utilization of staff and assets to address ranging needs across the country.

In this context, relocating BLM leadership closer to the actual fire activities in which the agency engages will provide greater understanding of the needs on the ground and better facilitate meaningful policies to help mitigate catastrophic wildfires. For instance, the hiring of seasonal staff to meet fire season needs often requires significant engagement with both the Deputy Director for Operations and Assistant Director for Human Capital Management, as well as the National Operations Center. Having the Deputy Director and Assistant Director close to the Center and to NIFC will create streamlined hiring for critical, lifesaving positions. Similarly, other emergency preparedness, staffing, and coordination with local law enforcement would be greatly enhanced by having bureau leadership closer to its operations in the field.

Other policy making functions would also benefit by being closer to the field. The BLM's management of livestock grazing on public lands would be greatly aided by closer interaction with the grazing community located in the West. Proximity to range technicians will also benefit the Assistant Director for Resources and Planning and staff, who work to create policies that directly impact the practitioners of the grazing and rangeland program.

D. Potential for Reduced Leasing Costs and Consolidation

The relocation of staff will lead to a more efficient operation and substantial cost savings for the Bureau. Perhaps the most striking savings is in lease space costs. With the location of a Headquarters in Grand Junction, which has affordable leasing options, cost can be reduced while increasing the Bureau's leadership presence closest to the resources it manages. To examine this, the BLM compared and analyzed lease space based on the General Services Administration (GSA)'s lease rates per square foot data for the Main Interior Building (MIB) in Washington, D.C., and an office location in Grand Junction, CO. The costs for 27 staff identified as part of the establishment of a Headquarters in the West are as follows:

- $50.00/per square foot for the MIB;
- $32.35/per square foot for an office space in Grand Junction.

In addition to the costs per square foot, the BLM estimates roughly $6,000/per person for equipment and furnishings, based on GSA estimates. The lease rates are specifically of immediate importance right now because the BLM is at a crossroads for its Washington, D.C. office. Currently, employees in Washington, D.C. are located in two facilities; the MIB on C Street in Northwest D.C., and the 20 M Street building in Southeast D.C. The lease for the M Street location expires at the end of calendar year 2020. Accordingly, approximately 450 BLM employees must vacate the building by the end of 2020. This includes employees in the BLM's Eastern States Office, which will remain in the Washington metropolitan area. A renewed lease for M Street is not an option, as the new rate would exceed $50 per square foot – a cost that is

substantially greater than is currently being paid and much larger than would be offered in Grand Junction.

For the 296 positions that will be relocated to the West and allocated to State Offices, existing office space in State, District, and/or Field Offices will be used to house staff, resulting in no incremental space costs as opposed to the real expense of moving these positions into the MIB. In the event that additional lease space does need to be acquired by State Offices, estimated commercial lease costs per square foot range from approximately $14.00/per square foot to $31.00/per square foot, which will offer a significant savings compared to the MIB square foot costs.

E. Decreased Travel Expenses

For FY 2018, BLM employee travel between Washington, D.C., and Western states totaled more than $3.2 million. Relocating staff to State Offices and establishing a Headquarters in the West will significantly decrease travel expenses for the following reasons:

- Frequency of travel to and from Washington, D.C., will decrease because executives' need to travel to and from D.C. will decrease.
- The overall duration of travel (shorter trips) is expected to be reduced when BLM personnel are located more centrally to the location of BLM activities.
- Travel time to and from training centers will decrease, enabling more efficient training opportunities for employees, enhancing the BLM's ability to attract and retain talented employees, and allowing executive leadership more frequent opportunities to interact with staff during training opportunities.

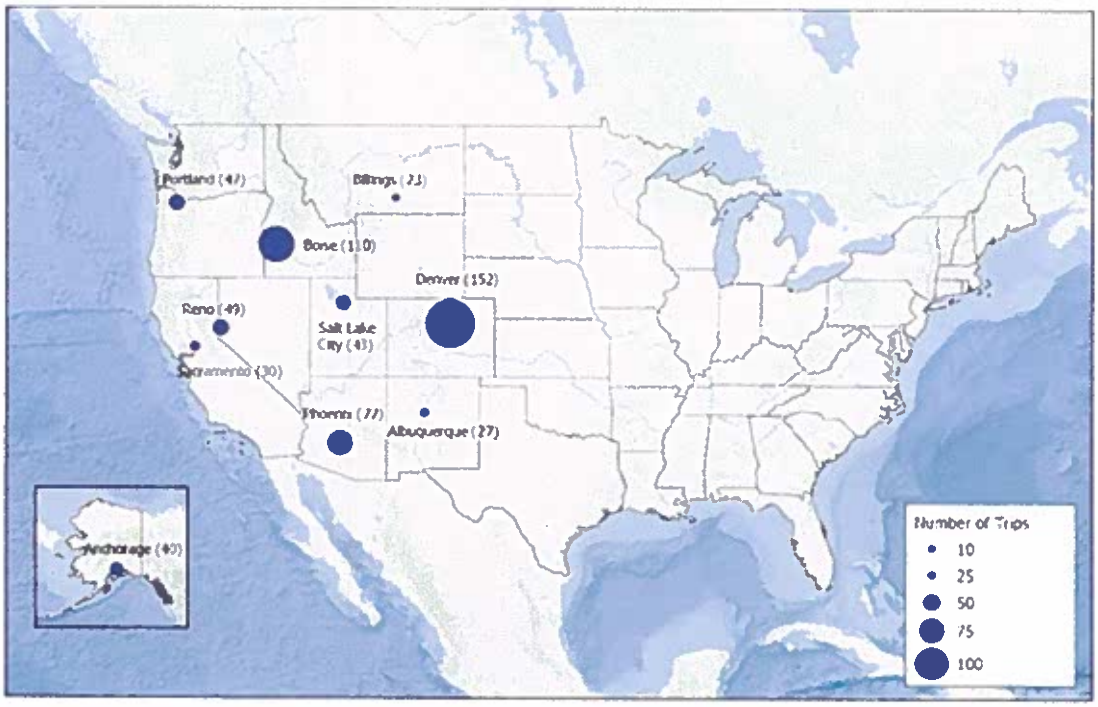

FIGURE 3. Most frequent BLM travel origination cities for travel to Washington, D.C.

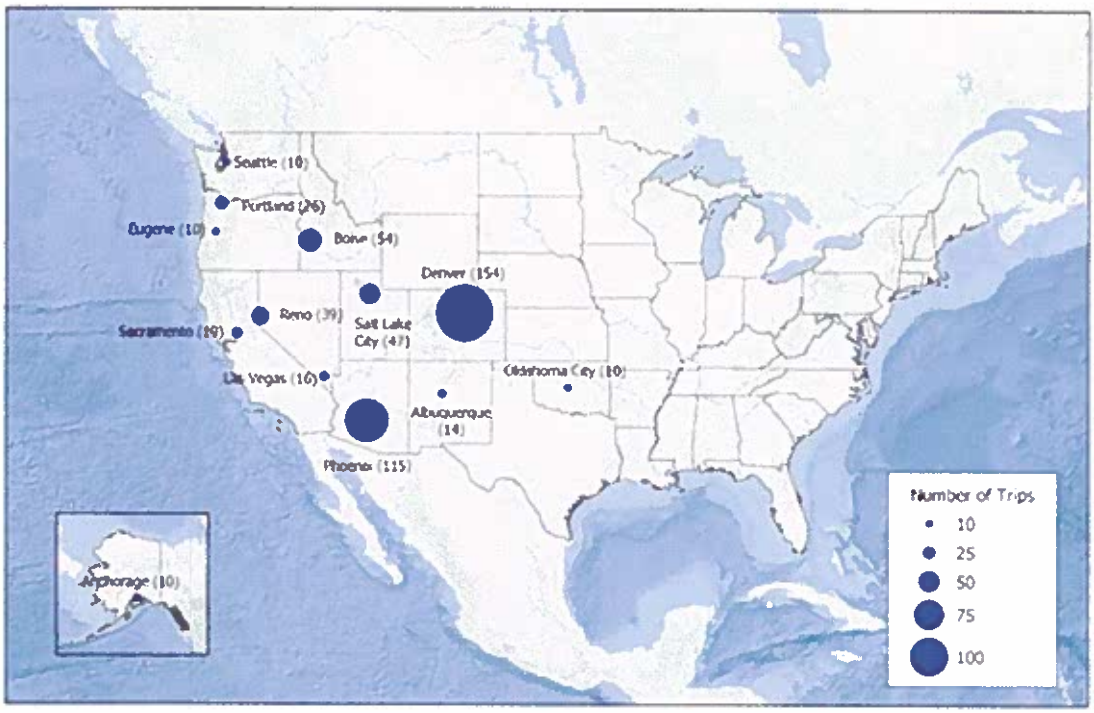

FIGURE 3. Most frequent BLM travel destination cities for travel from Washington, D.C.

The establishment of a Headquarters in Grand Junction will improve travel efficiency by reducing the number of long cross-country flights, resulting in shorter trips, and will allow more opportunities for day trips in some areas. Shorter duration travel is more efficient, cost-effective, and is expected to increase productivity with increased time spent on work activities rather than travel. The alignment of staff to State Offices across the West will also result in similar benefits.

The BLM's training centers, located in Phoenix and Boise, are important resources for agency staff. These centers also provide space for meetings and conferences that many BLM staff already attend. In addition, training is provided for Department staff from other bureaus. The location of the training centers allows easy access by BLM and other DOI staff located in Western cities. Shorter direct flights, or drives, could replace long, cross-country trips. Relocation would also enable BLM leadership to more easily attend trainings and meetings and provide leadership perspectives for attendees. By locating staff closer to the training centers, opportunities for career development are also enhanced.

State-by-State Analysis

The following discussion provides detail on how the BLM relocation will impact Western states where the vast majority of BLM's lands and programs are located.

Alaska: Four headquarters positions will be allocated to the Alaska State Office in Anchorage, Alaska, to address needs specific to NEPA analyses, realty, and business support. The State Office requires expertise and guidance within these capacities to support:

- Implementation of the Vietnam Veterans Allotment section of the Dingell Act [Public Law No: 116-9];
- Navigability determinations for title purposes in utilizing the Recordable Disclaimer of Interest (RDI) process to clear title for submerged lands and RS2477 claims by the State of Alaska; and
- Mining Law Administration program.

Arizona: Thirty four positions currently in Washington, D.C., will be relocated to the Arizona State Office and the National Training Center, which is based in Phoenix. These positions will support both national and on-the-ground priority work related to planning, lands, and realty. Five additional positions will also be allocated to the State Office. These changes benefit both entities. Given the ongoing work occurring in the State, as well as the training opportunities that the National Training Center provides to employees across the country, the location of these staff members will be integral to educating and empowering the Bureau. Staff from Resources and Planning and Energy, Minerals, and Realty with training-based program descriptions are needed in Arizona and will address a considerable deficit facing the Bureau.

Specifically, the State Office has indicated it will benefit from the policy discussions and mentoring regarding priority work, including:

- Realty and right-of-way priority/special projects and backlog;
- Special legislative projects, such as implementation of Public Law No: 116-9; and
- Strike team assignments in response to time sensitive and special projects.

California: Twelve positions currently in Washington, D.C., will be relocated to the California State Office in Sacramento and 8 additional positions will be allocated to the State Office. As I indicated above, because there are a number of solar, wind, and geothermal projects in process in California, and in neighboring Nevada, the primary focus of these positions will be in support of the Renewable Energy Program. The upward trend for renewable energy projects is expected to continue along with an increase in complexity. These staff will be able to assist with navigating implementation of the Geothermal Steam Act and the BLM's regulations in a complex and litigious setting. They will also be available to support responding to protests, appeals, and litigation, and engage, as appropriate, on NEPA matters related to the outcomes of appeals and litigation. Having realty expertise for rights-of-way (renewable energy, utility and other rights-of-way renewals) will benefit the State, as will having realty specialists to assist with coordination of work and who can provide expertise across all areas of lands and realty.

Collectively, these positions will be best able to support national policy needs while also providing support to the State Office. Several positions will be derived from the Bureau's Communications directorate to support both national Bureau objectives and the State's emerging media outreach initiatives.

Colorado: Eighty-five positions currently in Washington, D.C. will be relocated to Colorado. Fifty-four positions will be split between the Colorado State Office and the National Operations Center in Lakewood. Twenty-seven positions will be located in the BLM's Headquarters in Grand Junction. Four additional positions will be allocated to the State Office. Colorado has diverse resource needs, ranging from minerals to recreation, and it also serves as a hub for the Bureau's Geographic Information Systems (GIS) projects and priorities. As such, positions from nearly every Directorate will be located in the Lakewood offices. This includes Business and Fiscal Resources Management positions, which will allow both the State and the Bureau to benefit from the development of policies and procedures that directly impact day-to-day operations.

The relocation of these positions will also provide benefits in the transfer of knowledge from senior staff to the next generation through their proximity to State and field office personnel. Relocated staff will be able to provide a shared resource and expertise to support field operations. These employees will be able to take on complex strategic assignments, such as negotiating State Historic Preservation Office protocols and streamlining the policy development and review processes. Having these positions relocated to Colorado will enable these professionals to integrate into existing BLM work groups and networks and improve their functional capabilities.

Eastern States: Two positions currently in Washington, D.C., will be aligned to the Eastern States Office in the Washington, D.C. metropolitan area to address business and human resource support needs. In turn, the State Office will be in a position to better assist its employees who oversee its solid minerals program, strategic planning for recreation sites, and support for NEPA-related projects.

Idaho: Fourteen rangeland management positions currently in Washington, D.C., will be relocated and four additional positions will be allocated to the Idaho State Office in Boise to support the State's staffing and policy priorities. Given BLM Idaho's long and complex history of litigation, the State will benefit from additional resources in the range program to assist with the preparation of testimony and depositions. In addition, extra capacity to manage over 1,900 permits will greatly expand and enhance the State's grazing program. The positions will also leverage national policy responsibilities and assignments to allow for more integrated coordination on a State basis. The public will benefit from better coordination of regulations, policy guidance, and other actions with the States.

Montana/Dakotas: Three headquarters positions will be allocated to the Montana/Dakotas State Office in Billings, Montana, to address needs specific to NEPA compliance, energy, minerals, and realty. Given the number of NEPA analyses in process, including those as a result of litigation, the presence of additional planning resources will expand the State Office's capacity to address these matters with greater efficiency. Further, given that this State Office also covers activities in North Dakota, support for the energy, minerals, and realty related projects will be beneficial. In particular, the additional resources will allow for continued investments in the Access Initiative, consistent with Secretarial Order 3356 and 3373, specific to identifying landlocked public lands. This pilot program, which covers the entire western United States, is the

template for the Bureau in its efforts to expand its GIS capacities while promoting increased recreational access opportunities.

Nevada: Approximately 67 percent of the 48 million acres in Nevada is managed by the federal government. Nevada has several program areas that would benefit from the assignment of headquarters positions to the State Office in Reno. Specifically, the State has a demand for:

- National project management in the minerals program for the Anaconda Mine cleanup under the Comprehensive Environmental Response, Compensation, and Liability Act;
- National geothermal program management, given that Nevada has the largest program in the Bureau;
- National project management for utility scale renewable energy projects, including interstate transmission lines, and wind and solar energy projects; and
- Additional on-range management of the Bureau's wild horse and burro program, given that Nevada has the highest horse and burro population in the nation.

These specialists will be an asset to Nevada's workforce and will provide strategic planning, mentoring and knowledge transfer. For this reason, 32 positions currently in Washington, D.C., will be relocated and 17 additional positions will be allocated to the Nevada State Office.

A portion of these positions will support the State's work on over 10 Environmental Impact Statements specific to mining and renewable energy projects. BLM Nevada also has the largest Mining Law Administration program and serves as the primary contact for all BLM State offices, which will help the Bureau leverage expertise when creating and implementing national policies on these matters. Positions tied to the National Conservation Lands program, which will provide the State with increased management support, will also be allocated to Nevada. And given that Nevada has the largest wild horse and burro populations, 12 of the 17 allocated positions will allow the State Office to expand and maximize its capacity to address challenges associated with that program. Collectively, this realignment will enable Nevada to leverage national program staff where the BLM resources, partners, and public land users are located.

New Mexico: Thirty-two positions currently in Washington, D.C., will be relocated and seven additional positions will be allocated to the New Mexico State Office in Santa Fe to perform priority and understaffed functions. This includes support for the minerals program and support for cultural, paleontological, and tribal programs. Given the significant activity across the State, including the revision of several Resource Management Plans, aligning staff to assist with both functions will benefit the public by having the capacity to leverage resources to promote better coordination, including with our partners on the ground.

Additional advantages specific to New Mexico include:

- Program alignment featuring more hands-on assistance, coaching and feedback;
- Enhanced training with corporate knowledge sharing, which directly bridges to the states.

BLM New Mexico's planning development for Land Use Plans, as well as implementation of Public Law No. 116-9, will improve with access to, and more direct contact from, specialists—

particularly within the Resources and Planning and Energy, Minerals, and Realty Management Directorates. This is why a number of relocated positions within these programs will be available to help support State Office specific needs in these areas.

A number of the allocated positions are specific to communications, human resources, and budget support. These positions are being allocated to the State Office to expand its capacity for State-wide communications and enhance support for employees

Oregon/Washington: Two positions currently in Washington, D.C. will be relocated and three additional positions will be allocated to the Oregon/Washington (OR/WA) State Office in Portland, Oregon. Given the ongoing work with both the Oregon and California Railroad Revested Lands (O&C Lands) and Public Domain forestry programs, the alignment of these staff will improve the development of national policies and regulations through on-the-ground experience and coordination with district and field staff.

Having the program leads in Oregon will greatly benefit the national lead in understanding and overseeing this unique program and will provide increased support and expertise to OR/WA. Projects in these States are also under a great deal of outside scrutiny and often litigated. A program lead in close proximity will provide direct and daily guidance to issuing defensible decisions. Further, allocating positions to OR/WA will allow the State Office to expand its human capital support while addressing vacancies to support its extensive recreation program, given the many developed campgrounds, recreation areas, wilderness areas, monuments and Wild and Scenic Rivers, and recent legislation that has increased its recreation offerings. Additional support will allow for improved coordination and communication on the ground with stakeholders.

Utah: Thirty-seven positions currently in Washington, D.C. will be relocated and seven additional positions will be allocated to the Utah State Office, which will enhance operations both at the State level and the District and Field Offices, as well. Positions include those derived from the National Conservation Lands program, which has an arm focused on recreation and visitor services. Given the growth in recreation opportunities across the State, these positions will provide increased support to the field while offering improved coordination with external partners and direct exposure to the resources the Division manages. Other positions which are tied to the Resources and Planning Directorate will provide additional capacity for the State's many NEPA-specific projects. Lastly, positions under the Communications Directorate will be allocated to the State Office in order to better support the State's public affairs needs, while also being strategically located in proximity to other Western States, enhancing the ability to respond quickly to emergencies.

BLM Utah's priorities related to lands and realty, planning and environmental analysis, travel management, and air quality make these program areas particularly suitable for their location in Utah. Additionally, the State will benefit from positions allocated to the State Office to support the described above priorities as well.

Wyoming: Five positions currently in Washington, D.C., will be relocated and 10 additional positions will be allocated to the Wyoming State Office in Cheyenne. Placement in this State is

logical given that these positions are all directly tied to the Bureau's leasing programs and there is an immediate staffing need to support programs in the Powder River Basin. Additionally, having the co-lead and economists for these programs located in Wyoming will provide a national leadership presence closest to the majority of the public served by the program. Some positions will support a number of immediate needs within the State, ranging from increases to the number of staff supporting Wild Horse and Burro Program needs, to additional support for the State's own human capital, communications, and National Conservation Lands programs.

Collectively, this state-by-state approach is the most meaningful way to optimize positions across the Bureau's western footprint. As discussed above, states will benefit from the presence of additional staff that possess experience and expertise in performing duties that address headquarters priorities, but which understand how to utilize that knowledge to advance each state's localized, day-to-day operations. More importantly, the Bureau will be better able to serve the American people with an increased staffing presence closer to the resources it manages, which in turn will allow for more informed and locally coordinated decision making.

Conclusion

The implementation plan will delegate more responsibility and authority down to the field, optimize services available to the American people, is demonstrably cost-effective, and will provide an increased presence closer to the resources the BLM staff manages. As discussed in this letter, this is achieved through the following actions:

- Maintaining the necessary core headquarters functions in Washington, D.C.;
- Optimizing the efficiency of positions currently based in Washington, D.C. by relocating them to the State Offices across the West which their work supports;
- Allocating positions to State Offices to perform essential State Office functions;
- Establishing a Headquarters in Grand Junction, CO.

The redeployment of the BLM's headquarters functions to Western locations is beneficial for the BLM's employees and the constituents they serve and for every American taxpayer. The savings generated from reduced costs for facilities, travel, payroll, leases, etc., are significant. In addition, this initiative brings employees closer to the land they manage, which will result in more informed and better coordinated decisions made in the work the BLM does, so that land management decisions affecting the way of life for residents across the West will now be made and advised by staff based in the West, not in Washington, D.C.

This effort represents the Department's role in fulfilling Congress's commitment to the West more than 82 years ago by properly aligning the BLM's function with its resources and constituents. We intend to begin implementation consistent with our spend plan allocation.

A similar letter is being sent to the Honorable David Joyce, Ranking Minority Member, Subcommittee on Interior, Environment, and Related Agencies; Committee on Appropriations, House of Representatives; the Honorable Lisa Murkowski, Chairman, Subcommittee on Interior, Environment, and Related Agencies, Committee on Appropriations, United States Senate; and

the Honorable Tom Udall, Ranking Minority Member, Subcommittee on Interior, Environment, and Related Agencies, Committee on Appropriations, United States Senate.

Sincerely,

Joseph R. Balash
Assistant Secretary
Land and Minerals Management