

**Congress of the United States**  
Washington, DC 20510

August 22, 2019

Mr. Joseph Balash  
Assistant Secretary for Land and Minerals Management  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Mr. Balash:

We write in response to your letters of July 16, 2019, and August 8, 2019, regarding the Department's proposed reorganization of the Bureau of Land Management (Bureau).

Based on the incomplete and superficial information that you provided, it appears that the proposal to relocate Bureau headquarters is not based on rigorous financial and organizational analysis, nor is it intended to increase the Bureau's accountability and improve the management of our nation's public lands. Instead, we are concerned that the proposal is designed to reduce the Bureau's effectiveness and relevance. As a result, we object to the Department moving forward with the reorganization of the Bureau and the relocation of its staff.

Any serious effort by the Department to restructure a large, multi-disciplinary organization like the Bureau should have more directly involved Congress, Federal land management agencies, State and local governments, American Indian and Alaska Native tribes and tribal organizations, industry, conservation organizations and the public at large. It also should have included extensive consultations with management experts trained in organizational structure, operation, and finance, and incorporated comprehensive, long-term estimates of costs and benefits as part of its foundation. Instead, the lack of meaningful external collaboration and the lack of supporting detail we have received to justify this proposal leaves us to conclude that the Department made a political decision to move the Bureau's leadership out of Washington and simply reverse-engineered its analysis to fit that objective.

Further, the apparent lack of real consultation with Bureau employees—a talented and dedicated group of individuals with a tremendous base of administrative knowledge—also suggests a proposal that was deliberately created without regard to the experience and expertise of those employees. The situation is made worse by the refusal or neglect of the Administration to even nominate a qualified permanent director to advocate on behalf of the Bureau and lead its attempted reorganization efforts.

Based on our review of the materials you presented, the Department's decision to segregate the Bureau's headquarters staff in Grand Junction, Colorado, does not appear to be supported by any serious analysis as to why that location was chosen rather than a similarly-sized location or a major transportation hub elsewhere in the West. More importantly, however, the Department has made no

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effort to show how moving the headquarters staff out of Washington will improve accountability and accessibility. Instead, we are troubled that the relocation is likely to result in fewer interactions between the Bureau's leadership and Departmental officials, other agency leaders and Members of Congress, which will lead to reduced transparency and access for the Bureau to the political and policy decision-making that occurs in Washington. In addition, most Western stakeholders make regular trips to Washington to visit with federal officials. They will now be forced to make an additional trip to Grand Junction, or potentially several other locations, if they have business with the Bureau's top leadership.

Under different circumstances, any one of these deficiencies cited could be explained away as the result of a planning process that was too rushed or was not comprehensive or inclusive enough. But taken together, and in light of the recent appointment of an acting Bureau Director with a long-established record of attacks on public lands, the actions of the Department suggest something far more damaging: a deliberate effort to dismantle and weaken the Bureau. While we support the concept of more resources on the ground to support the work of the Bureau in Western states, we do not believe this proposal to move Bureau leadership outside the capital will ultimately improve the Bureau's operations, increase accountability or enhance management of our nation's public lands.

Although it was made clear that the Department intends to proceed with the relocation of the Bureau—regardless of our position—we oppose any further action by the Department to implement this proposal. We call on the Department to immediately suspend its efforts to relocate Bureau functions or positions and to work with Congress and other stakeholders to create a reorganization plan that will actually improve the effectiveness and accountability of the agency and earn bipartisan support.

Sincerely,



Tom Udall  
Ranking Member  
U.S. Senate Appropriations Subcommittee  
on the Interior, Environment, and  
Related Agencies



Betty McCollum  
Chair  
U.S. House Appropriations Subcommittee  
on the Interior, Environment, and  
Related Agencies