



Bureau of Land Management In Transition
Critical Change Is Needed
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The following represents a collaborative effort between a number of past and present BLM mid-level and senior staff. Contributor names follow at the end of the document. Some wish to remain anonymous.

The Immediate Public Land Challenges

The Bureau of Land Management faces five key challenges:

1. Climate Change.
2. Special Area Protection.
3. Sustainable Energy Development
4. Restoration of Degraded Landscapes
5. Managing the Wildland/Urban Interface

Proposed BLM Action Agenda

■ Personnel

CRITICAL –

. Review all Bush political appointees who will be or have been moved into career slots

(“burrowed-in”)

. Where it applies, use career conditional status personnel rules to remove those appointees who do not meet the qualifications for the position they fill or move Bush politicians quickly to positions of unimportance

. Move new people in quickly: place appointees not requiring confirmation within the agency immediately (3mos,) and place appointees requiring confirmation within 3-6 months. . The Clinton and Carter Administrations delayed and paid a price..



- . Within 6 months, evaluate professional development in renewable resource programs; develop an action plan to avert loss of institutional knowledge and technical skills.

■ General.

- . Change the reward system for managers from its current emphasis on expediting energy production to an emphasis on sustainable land and water stewardship.

- . Working within the national service framework, create a new Restoration Corps: jobs, public works; infrastructure; resource rehabilitation; trails and facilities construction and implement this within agencies; no new organization.

- . Charge a fair price for public resources and end the give-away/fire sale of public resources to private entities.

- . Expand public/private/interagency partnerships, and ensure that they are not just a channel for enriching "partners." Make partnerships a "critical element" for all managers.

- . Review all work that has been "outsourced" over the past 8 years and determine those workloads that should more appropriately be completed by agency staff.

- . Complete a comprehensive workforce plan to rebuild lost expertise and prepare BLM for greater emphasis on renewable resource programs and managing with global climate.

- . Complete a comprehensive review of regulations and policies adopted in the past 8 years that are obstacles to the long-term health and restoration of public lands and waters, and identify needed new regulatory mechanisms.

- . Review BLM's budget and find opportunities to enhance funding by increasing fees for commercial activities on public lands, such as a percentage dedicated to restoration and enhancement of BLM lands. Establish a nonpartisan task force to work with the Congress.

■ Energy Program



- . Review all energy program activities and restore the balance between fossil fuel leasing and extraction programs and balance use with resource conservation:
- . Develop a strong national energy program that includes all aspects: exploration; development; transportation; rehabilitation; resource protection; rights of way; renewable and non-renewable energy and potential impacts to global warming.
- . Stop March energy lease sale until the following are completed:
 - o Put all current lease applications on hold pending additional review.
 - o Establish a short term, 3-month task force to assess where existing leases have been issued; percent in operation; percent being held without any action.
- . Task force specialists to include, at a minimum: wildlife; energy; hydrologist; systems ecologist; grazing; watershed.
- . Determine if recently issued (last 3 months) leases are valid (e.g., adequate environmental controls, global climate change concerns, conflict with wilderness characteristics areas or adjoining national parks, etc.).
- . If leases were improperly issued, refund fees paid under 60-day window.
- . If properly issued leases were in controversial lands with high public values, consider buying back or trading for leases elsewhere.

Draft a schedule of which leases are appropriate and which are not – focus on areas that need to be protected.

- . Enforce resource stipulations, monitoring requirements and rehabilitation requirements on all current and previously completed drilling/permit sites.
- . Identify areas that should not be considered for leasing
- . Support field management decisions – do not overturn at a higher level simply for the benefit of energy development.



- . Review all leasing stipulations; add resource protection requirements . Reinstigate “no surface occupancy” stipulations and other restrictions to minimize impacts to sensitive resources.
- . Extend the review period for all Applications for Permit to Drill. No APD should be issued before sensitive resources have been inventoried.
- . Require pooling of energy companies' facilities ,to minimize surface impact (as currently required in Alaska’s North Slope).

■ Wildlife

- . Develop additional wildlife capacity within each state and field office to accommodate environmental planning, reviews, and permitting activities, as well as inventory, monitoring, and conservation planning for biological resources.
- . Re-emphasize the conservation of special status species and restoration of their habitat. . Review any recent changes to BLM policy regarding federally listed and BLM sensitive species that have weakened the Agency's ability to proactively conserve species before they become federally listed.
- . Emphasize through policy and budget processes that fish, wildlife and special status species funding is to conserve "at-risk" species and habitats.
- . Advise management not to assign wildlife, recreation and other non-oil and gas staff to oil and gas permitting activities, except to the extent of reviewing the wildlife/environmental implications; they are to focus on their issues and not used as surrogate oil and gas specialists. At present, leasing and permitting activities take precedent over conservation activities and are not funded by the benefiting programs, as they should be.
- . Request that staff advise the transition team on where wildlife protection stipulations (in RMPs and oil and gas EISs leases) were replaced by “performance based” stipulations during the last 6 years, in order to expedite considerations that were overlooked in the leasing process. Ensure that adequate pre-leasing inventory and post-leasing monitoring is completed by BLM biologists or biologists hired and supervised by the BLM. Funding for this work should be provided either by the oil and gas program or the leasing entity.

■ Wilderness



- . Leave wilderness inventory and wilderness management policy intact
- . Manage wilderness study area proactively; do not allow degradation.
- . Reverse 2003 “no more wilderness” policy and restore “wilderness inventory areas” BLM was protecting in Utah & Colorado.
- . Establish process to extinguish bogus RS 2477 road claims within WSAs and other special areas.
- . Move to designate outstanding WSAs as wilderness based on existing inventory. Review and, if called for, revise planning documents to update inventory data, and work with congress to take care of the designation backlog.

■ National Landscape Conservation System

- * Pass the 2008 Omnibus Conservation Act that included the formal establishment of the National Landscape Conservation System.
- * Expand and invest in the National Landscape Conservation System. NLCS can be the boldest new model for conservation in the last 100 years, as it provides the protection of large landscapes and their scientific, cultural and natural resources while allowing sustainable recreation and resource uses to continue.

■ Recreation

- . Recognize recreational use as a significant environmental impact and analyze and evaluate its cumulative impact to land and water resources.
- . Provide users with trail maps ala the Forest Service’s example (hiking, bird-watching, etc); web site info on opportunities; outsource to local groups to develop where BLM capability is lacking.
- . Adopt a sensible Built-Environment Program; create standards for new development that minimize resource impacts and energy use and make the government a model for this concept.
- . Address burgeoning OHV use in the west by implementing Comprehensive Travel & Transportation Mgmt. and adopt overall policy of restricting OHV use to sustainable and enforceable system of routes



- o Require agencies to identify designated road and trail systems either through planning or through executive order. See pending GAO report on the management of OHVs and federal lands.

- . SAFTEA-LU transportation act should include programs to continue and expand the Federal Land Highway system, trail enhancements, alternative transportation for parks and public lands components and include BLM in eligibility.

■ Grazing

- . Restore all 1994 Healthy Rangelands policies that were not overturned by legal decisions.

- . Restore degraded grazing lands with native plant species, emphasizing riparian areas and key wildlife habitat.

- . Revamp Resource Advisory Councils to focus on recommendations for buying out marginal and degraded grazing allotments, rehabilitating and resting.

- . Remove regulatory impediments to reducing overgrazing. Allow ranchers and nonprofits to hold grazing permits without putting livestock on the land; allow BLM to retire an allotment when nonprofits buy out grazing permits.

■ Resource Management Plans

- . Review all RMPs completed within the last 6 years (especially Western Oregon Plan Revision and six RMPs in Utah) to determine if they reflect reasonable balance between energy/timber development and protection of biological, recreational, and cultural resources. If not, amend for better balance.

- . Set up task force of state and national resource specialists to complete RMP review referenced above within 6 mos.

- . Restore field office authority to inventory and study wilderness during the RMP process, on the same basis as all other resources.



- . Put a strong emphasis on travel management; public lands are still subject to adverse impacts from unmanaged vehicles of all types.
- . Review BLM planning schedules and priorities. Coordinate plans within the same regional-scale ecosystem to address landscape and regional issues.
- . Re-establish BLM planning teams at district/multi-district levels to develop internal expertise, improve consistency and quality and save money. Eliminate all "outsourcing" contracts for basic planning.
- . Make clear to field offices that no land-use decision will be made without critical, professional environmental reviews.

■ Emergency Withdrawal Rule

- . Withdraw or rescind the rule change revoking the emergency withdrawal regulations in 43 CFR 2310.5.

■ Wild Horse and Burros Act

- . Provide funds and support for population control measures so healthy populations can be maintained.
- . Enhance public/private partnerships e.g. study the viability of Mrs. T. Boone Pickens' proposal to move animals to a private ranch – would save government funds and BLM has never had the resources to manage this program properly.

■ NEPA and Endangered Species Act Regulation

- . Any new regulations or BLM policy affecting endangered, threatened or sensitive species should be reviewed and, if necessary, rewritten to ensure that species conservation, habitat protection and biological science are given priority over proposed. Encourage additional landscape-scale conservation measures for habitats supporting special status species through the use of regional and watershed-scale habitat conservation planning, new tax incentives and safe harbor agreements for private landowners, and additional federal/state/industry/community partnerships.



■ Repeal the 1872 Mining Act

- . □ The act is antiquated; replace it with a conservation and restoration oriented act that provides for an equitable and fair return to the public for the use and exploitation of mineral and non-renewable resources. Place some of these funds in a Natural Resource Fund.
- . □ Address Abandon Mine Lands as a public health risk and design regulations that require full NEPA review for exploration and development mine plans.

■ Reform Wildfire Policies

- . □ Restructure the financing of wildfire. Fund an aggressive “fire restoration” program as a means to get ahead of the problem. Fire protection costs should be borne by those living in the wildland urban interface. A new Federal Fire Insurance Program for homes and businesses built in fire-prone regions would help offset costs of Federal fire services. Surcharges would go to fire prevention, suppression and restoration activities in the wildland urban interface.
- . □ Inform and educate the public that it is not federal land management agencies' mission to protect homes and private property; protecting public land resources is. People must take responsibility for where and how they build.

■ Reinvigorate the Land and Water Conservation Fund

The LWCF should be fully funded as originally intended. Amend to allow the use of off shore oil and gas revenue for energy conservation to provide recreation amenities, trails and infrastructure along with natural or cultural resource restoration

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