

26 November 2019

Secretary David Bernhardt U.S. Department of the Interior 1849 C St. NW Washington, D.C. 20240

Deputy Director William Pendley Bureau of Land Management 1849 C St. NW Washington, D.C. 20240

Secretary Bernhardt and Deputy Director Pendley,

We understand that several Bureau of Land Management career professionals have recently received notice that they have until December 12 to determine if they will accept a relocation of their position, pursuant to the Department's efforts to move BLM employees out of their Washington, D.C.-based offices. We have concerns about how this relocation effort will impact BLM's career professionals and their work of conserving wildlife and natural resources on public lands.

The Wildlife Society serves to inspire, empower, and enable wildlife professionals to sustain wildlife populations and their habitat through science-based management and conservation. Founded in 1937, TWS and our network of affiliated chapters and sections represents more than 15,000 professional wildlife biologists, managers, and educators dedicated to excellence in wildlife stewardship.

Our understanding is that several hundred of the Bureau's staff based in Washington, D.C., offices – including those in wildlife, threatened/endangered species, fisheries, and rangeland resource program areas – will have their positions relocated to several different areas in western states. Wildlife staff will be relocated to Utah, Fisheries staff will be relocated to Colorado, Rangeland Resources to Idaho, while the Director of the agency and the remainder of its top leadership will be based in Grand Junction, Colorado – leaving only a handful of staff in the D.C. offices.

The proposed move will directly affect wildlife professionals, their livelihoods, and their ability to successfully and efficiently conduct wildlife conservation and management activities across federal public lands. The relocation will impact not only those professionals that work for the agency, but also those in other federal agencies, state agencies, universities, and conservation organizations that partner with the agency to achieve its mission. It will also change the agency's ability to consider wildlife science when it is making and influencing policy decisions by the Department, Administration, or Congress.

Those effects could be varied, and while we recognize that there could be some marginal benefits, we have several concerns about how this move will impact the agency, its professionals, and science-based wildlife conservation. Thus far, the agency has done little to adequately address these concerns and potential challenges associated with the impending move.

The movement of these career professionals and national program areas outside of the D.C. area has the potential to:

1. Reduce the ability of the wildlife, fisheries, rangeland resources, and other natural resource program areas to collaborate internally. The individuals in these program areas provide national leadership on policy, partnerships, state agency collaboration, resource planning, and communications. Their ability to collaborate, coordinate on national initiatives that span across program areas, learn from each other, and share ideas as a holistic team is key to the success of BLM's mission. Separation of these program areas in various state offices risks limiting their effectiveness and efficiency.

- 2. Challenge their ability to work with external partners and other agencies. Most external partners, vital to the success of the BLM, have primary offices in the D.C. area. They value the inperson availability of BLM national program leadership to enhance collaboration on mission-driven conservation activities. This moves takes the agency's programs out of the circuit of these key partners.
- 3. Limit the expertise available to Department of the Interior political leadership and congressional offices when they make policy decisions that affect wildlife and public land management. The vast majority of agency personnel in the resources program areas are already located in western states, providing on-the-ground expertise and management functions at the local level. Their front-lines work serving the American people is aided and supported by the efforts of the career professionals that provide national program leadership in D.C. to ensure resources are available and political leadership is appraised of their needs and challenges, and informed by science when considering policy changes.
- 4. **Minimize their ability to collaborate with state agencies.** Collaboration with state wildlife and natural resource agencies is critical for the success of these program areas. Moving them out of the D.C. area and dividing them among a variety of state offices will limit their ability to coordinate and collaborate with states across the country. D.C. provides a centralized location, outside the influence of a particular state office, which simplifies the ability for state agencies to access and collaborate with these national program leads on policy and conservation activities.
- 5. **Risk undue influence of one state BLM office over a national program.** These program areas are tasked with providing coordination, planning, and policy at a national level. They are responsible for planning resource needs and allocations on issues related to their program for all states. Placing national program personnel in a single state office, managed by a BLM state director, risks having the national program influenced heavily by one state's needs. Such influence could result in ineffective resource allocation or policy development that fails to prioritize the needs of the agency on a national level.
- 6. **Pull existing funding from mission-oriented efforts to finance the relocation.** Thus far, it is our understanding that Congress has not yet appropriated funding specific to this relocation of personnel. As such, we are concerned that funding intended to be used to support the conservation efforts of these individual program areas will be reallocated to moving these employees and setting up these new offices.
- 7. Disrupt and negatively affect the employment trajectory of BLM career professionals, cause a loss of institutional knowledge in the agency, and create vacancies that slow down the agency's work. The professionals in the BLM's Washington, D.C. area offices will have their personal lives disrupted by this relocation. Those that accept the relocation will have to uproot their families and alter their lives they've build in D.C. Many of them may be unable to accept the reassignment, causing their careers with the agency to come to an end. Either outcome will disrupt the future of their careers and impact the institutional knowledge available to the agency. Additionally, vacancies created by the loss of employees will likely take months to fill, further exasperating the strain on agency's capacity to conduct conservation work

We raise these concerns in hopes that you will consider them in your ongoing decision-making regarding the Bureau's operations and work to address them to ensure that Bureau personnel and policies are well-equipped to sustain wildlife populations and their habitats on the United States' public lands.

Sincerely,

Sam C White

Gary C. White, PhD, CWB® President Cc: Senator Murkowski, Senator Udall, Representative McCollum, Representative Joyce