

June 12, 2017

Mr. Mick Mulvaney, Director
Office of Management and Budget
725 17th St., NW
Washington, DC 20503

Re: Notice of Request for Comment on Government-wide Reform

Dear Director Mulvaney:

As representatives of the undersigned conservation organizations, we write to you today to express our strong support for continued and robust investment in the land management agencies¹ -- the U.S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, and the Bureau of Land Management (BLM) – and their conservation programs. Together, these agencies administer on behalf of the American people more than one billion acres of public lands and waters that attract over half a billion visitors annually.² The undersigned organizations represent millions of Americans who deeply care about our public forests, grasslands, deserts and waters. Our members and supporters value these priceless public assets for the water and clean air they provide to communities, the outdoor recreation they offer, the wildlife they harbor, and the resources they contain.

On March 13 2017, the President signed [Executive Order 13781](#) directing you, as Director of the Office of Management and Budget (OMB), to develop a plan for reorganizing the executive branch, including recommending agencies, programs, and functions for elimination. Subsequently, you launched [a 28-day comment period](#) asking the American public to weigh in on how to reorganize, reduce, and eliminate federal agencies.³ While we disagree with the premise that drastic changes to our federal resource management agencies are necessary, to the extent that you intend to reorganize and possibly eliminate agencies, we respectfully request that you consider the economic importance of these agencies and their conservation programs – and not only retain them, but also ensure they are sufficiently funded.

¹ While we use the term “land management agencies” we note that it reflects more broadly public lands and waters, including marine refuges.

² See US Forest Service, 2012. National Visitor Use Monitoring Report. Available at: https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf. Page 24; National Park Service. Annual Visitation Highlights. Available at: <https://www.nps.gov/subjects/socialscience/annual-visitation-highlights.htm>; Department of the Interior, Bureau of Land Management. 2015. Public Lands Statistics. Page 186; U.S. Fish & Wildlife Service, 2015. Annual Performance Report FY2015: National Wildlife Refuge System. Page 1.

³ 82 Fed. Reg. 22355 (March 15, 2017).

Federal Land Conservation is a Smart Investment

Our federal public land agencies administer on behalf of the American people more than one billion acres of land and water from Alaska to Florida and Maine to the South Pacific. The Bureau of Land Management, the National Park Service, the U.S. Forest Service and the U.S. Fish and Wildlife Service derive their management direction from their individual organic acts and other relevant guiding statutes that impose specific, congressionally mandated, constraints and duties. Specific to conservation, these include, among others, the Wilderness Act, the Wild and Scenic Rivers Act, the National Landscape Conservation System Act, the National Forest Management Act, the Federal Land Management and Policy Act, the National Wildlife Refuge System Improvement Act, the Endangered Species Act, the Clean Water Act, the Clean Air Act, the Multiple Use and Sustained Yield Act, the National Trails System Act, and the National Environmental Policy Act.

Conservation of our public lands and waters is among the country's smartest investments, providing incredible value at low cost to taxpayers. The combined budget of the federal natural resource management agencies accounts for less than 0.4% of the nation's annual budget,⁴ yet provides the American people with benefits worth billions of dollars. Our federal lands and waters supply this nation with clean water and air, trails and campgrounds, fishing and hunting, life-saving habitat for thousands of imperiled species, and unparalleled outdoor experiences. While these services are not bought and sold in stores, they generate immense economic returns. Consider that national forests, the single largest source of municipal water supply, services more than 66 million people in 3,400 communities. The value of this water exceeds \$7.2 billion annually.⁵ The National Wildlife Refuge System alone provides ecosystem services valued at \$32.3 billion to nearby rural communities.⁶ In direct economic terms, our nation's lands and waters are the infrastructure for an [outdoor recreation industry](#) that contributes nearly \$900 billion and 7.6 million jobs to the American economy.⁷

Further, federal public lands and waters are integral to sustaining healthy local economies. In today's economy many businesses are free to choose the location for their entrepreneurial endeavors. Federal public lands – and especially protected areas -- are important for attracting

⁴ Office of Management and Budget Historical Tables for Sub-Function 302. Available at: <https://obamawhitehouse.archives.gov/omb/budget/Historicals>.

⁵ USDA Forest Service. Information on Water Resources. Available at: https://www.fs.usda.gov/wps/portal/fsinternet/cs/detail!/ut/p/z0/04_Sj9CPyKssy0xPLMnMz0vMAfjo8zjQwgnNHCwN_DI8zPyBcqYKBfkO2oCA_BZcx5g/?position=Contribution%20Content.Html&pname=Forest%20Service&ss=119995&navtype=SubNavigation&pnavid=11014010000000&navid=110140110000000&ttype=detail&cid=stelprdb5107778.

⁶ Southwick Associates, 2011. The Economics Associated with Outdoor Recreation, Natural Resources Conservation and Historic Preservation in the United States For: The National Fish and Wildlife Foundation. Available at: <https://www.fws.gov/refuges/news/pdfs/TheEconomicValueofOutdoorRecreation%5B1%5D.pdf>.

⁷ Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Page 11. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>.

⁷ Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

and retaining talented workers, entrepreneurs and investors. Rural counties with greater proportions of protected public lands have higher incomes, higher employment levels and greater population growth than rural counties without such lands.⁸

Chronic Underfunding is Undermining Effectiveness of Natural Resource Agencies

Over the last few decades, our public lands agencies have suffered a decline in real budgets for critical programs and dwindling workforces. This has led to many difficult decisions: reduced visitor services and recreational investments, reduced scientific research and monitoring, compromised conservation and management, growing maintenance backlogs, and other impacts. For instance, between 1995 and 2015, the funding for the National Forest System has been reduced by 32% in real dollars, and the agency's staffing dropped by almost 40% between 1998 and 2015.⁹ This is in part due to the growing cost of wildfire suppression, which now consumes more than 50% of the agency's budget.¹⁰

Recent employee surveys reflect the impacts of chronic underfunding and staffing. A [recent survey](#) by Public Employees for Environmental Responsibility (PEER), a national organization representing federal, state and local government professionals, found that 67 percent of BLM employees believe the agency does not have enough resources to accomplish its mission.¹¹ The survey asked how the administration could best improve the BLM. Responses included:

- *"No hiring freeze"*
- *"NOT implementing a hiring freeze – that would be a disaster"*
- *"Do not further cut our funding. I have 1.8 million acres of land in my field office to manage and I am the only natural resources staff member"*
- *"Some people are doing 2-3 jobs just to get the job done."*
- *"Funding to fill vacant positions – more than 20 in our office."*

A similar [survey](#) of national wildlife refuge managers revealed that 94 percent of respondents were concerned that staffing at their refuge was inadequate to meet their core mission:

- *"Addressing the chronic funding shortages that prevent us from adequately staffing our refuges."*
- *"Providing resources to address our maintenance backlog and better serve the members of the public"*
- *"Not do an across-the-board federal govt. cut which would devastate our tiny agency"*

⁸ Headwaters Economics, 2017. Federal Public Lands in the West: Liability or Asset. Available at: <https://headwaterseconomics.org/public-lands/federal-lands-performance/>.

⁹ USDA Forest Service, 2015. The Rising Cost of Fire Operations: Effects on the Forest Service's Non-Fire Work. August 4, 2015. Available at: <https://www.fs.fed.us/sites/default/files/2015-Fire-Budget-Report.pdf>.

¹⁰ *Id.*

¹¹ <https://www.peer.org/news/news-releases/trump-hiring-freeze-hamstrings-his-own-agenda.html>.

- *“Increasing funding for the NWR system so we can hire employees to accomplish our mission”*
- *“The loss of staff has impacted all aspects of the National Wildlife Refuge System. The system no longer shines like it did 20-30 years ago”*

Specific Functions Deserving Enhanced Support and Prioritization

Given the clear importance of conservation and recreation on public lands and waters to our socio-economic well-being, we urge you not to cut – and instead bolster investment in – the following programmatic functions.

Recreation and Wilderness. Federal outdoor recreation and wilderness programs enable Americans to get outside and enjoy their national forests, wildlife refuges and other public lands through a wide variety of activities. They promote public health, enhance community well-being, unite families and friends, and foster citizenship of our nation’s natural resources. Investments promote access for hunters and anglers to world class fish and game habitat, and support local economies by attracting entrepreneurs and amenity-based businesses such as outfitters and gear shops. Specific programs that should be prioritized include:

- The Forest Service **Recreation, Wilderness, and Heritage program** whose funding has shrunk by 15% since 2001, even though recreation participation continues to steadily increase and is projected to increase by 30% for most activities by 2030.¹²
- The Forest Service **Capital Improvement and Maintenance program**, which supports maintenance of ~21,600 recreation sites, ~371,000 miles of roads, and ~157,000 miles of trails, and is essential to address serious public health and safety concerns, maintain public access to rural communities, and protect clean drinking water for 66 million Americans. Since 2001, funding for roads, deferred maintenance, and facilities shrank by 46%, 95%, and 68%, respectively; funding for the **Legacy Roads and Trails program** has been halved since 2010. Such severe reductions force the agency to close recreational facilities and access roads.
- The BLM **National Landscape Conservation System** that comprises over 30 million acres of some of the most scenic and expansive landscapes in our country, including national conservation areas, wilderness areas and other designations that attract visitors and help sustain healthy local economies.
- The BLM **Recreation Resources Management program** that enhances recreation access for all visitors to BLM lands, engages youth, promotes public health, protects visitor safety and strengthens rural economies.
- The Fish and Wildlife Service **National Wildlife Refuge System** that comprises 566 national wildlife refuges with at least one in every state and territory, includes over 20

¹² USDA Forest Service. 2016. Federal Outdoor Recreation Trends: Effects of Economic Activities. PNW-GTR-945. Available at: <http://www.coloradotpa.org/wp-content/uploads/2017/02/USFS-Econ-Impacts-Rec.pdf>.

million acres of wilderness, and prioritizes wildlife-dependent recreation for all Americans to enjoy. Wildlife viewing, photography, hunting, fishing, environmental education and interpretation are hallmarks of the Refuge System, deemed priority public uses when compatible with wildlife conservation.

- The Fish and Wildlife Service **Urban Wildlife Conservation Program**, a visionary partnership that helps urban constituencies discover, appreciate and care for wildlife and nature in their communities.

Land planning and restoration. Resource management planning is the foundation of an agency's stewardship responsibilities. Statutorily required, planning is necessary to ensure our public lands and waters continue providing the American people an array of benefits, including wildfire management, wildlife and fish habitat, outdoor recreation, clean water, and jobs. Management planning lays the groundwork for ecological restoration that improves the health of our lands and waters while injecting funds and jobs into local communities. Reduced investment impairs stakeholder engagement and collaborative decision-making that can support enduring and science-based management. Specific programs that should be prioritized include:

- The Forest Service **Land Management Planning, Assessment, and Monitoring programs** that are crucial for better wildfire management and restoration has shrunk by 44% since 2001. Land management planning is conducted in close collaboration with a national federal advisory committee comprised of diverse stakeholders charged with advancing sound implementation of the 2012 planning rule.
- The Forest Service **Wildlife and Fisheries Habitat Management** program that conserves, restores and enhances habitat for fish, wildlife, and rare plants. It is vital to the 3,500 imperiled and at-risk species that depend on national forest lands for their survival, and supports recreational fishing, hunting and wildlife viewing on national forest lands.
- The Forest Service **Collaborative Forest Landscape Restoration Program** that incentivizes long-term collaborative forest restoration.
- The National Greater **Sage-Grouse Planning Strategy** that is predicated on the concept of "saving" a species before it requires federal protection. Continued implementation of this strategy is important for the recovery of this critical western game species and those who rely on its habitat for their livelihood.
- **BLM Master Leasing Plans**, in which BLM evaluates potential conflicts and impacts on lands prior to leasing, leading to less conflict, better resource management, and more certainty. Increasing leasing and permitting without supporting environmental review and planning, including master leasing plans, will lead to more conflict, protests and litigation, and ultimately diminish the long-term sustainable flow of benefits into local communities and regions.

Renewable energy. Support and funding should continue for BLM's smart renewable energy program that supports development of sustainable, clean energy sources that make sense for

all Americans, and reduces our nation's carbon footprint. The program helps projects succeed in low-conflict areas, reducing impacts and cutting permitting times in half.¹³ Renewable energy continues to increase its market share in the energy arena as technology improves and costs continue to plummet, and drive strong job growth. A 2017 report by the Department of Energy found that solar energy supports 373,807 jobs, more than the jobs in the provision of natural gas (362,118) and over twice as many jobs in coal mining (160,119).¹⁴ Wind energy is also seeing strong job creation, supporting 101,738 jobs. Continued strong funding for the BLM Renewable Energy Program and other related programs within DOI agencies will support these economic and clean energy opportunities in a smart and responsible way.

Transparency and Public Engagement is Integral to Long-Term Success

Federal lands and waters are owned by all Americans. The federal land management agencies administer them on our behalf following the direction prescribed in the guiding statutes and through numerous programs developed over many years, often with extensive stakeholder involvement. While there is benefit in legitimate processes designed to improve program delivery, such exploration and subsequent administrative shifts will only succeed if the public is engaged and the process is transparent. To that end, we respectfully request that you share draft reorganization plans with the public in a way that allows for meaningful review and comment, and that you publicize the decision-making criteria and evaluative process. In particular, for each agency, it would be very helpful to better understand:

- The criteria to be used by OMB to make decisions related to the reform or elimination of agencies and their functions;
- How public comments will be incorporated into the decision-making process;
- How non-market benefits and public value will be accounted for in cost-benefit analyses;
- When OMB will share a draft report with the public for meaningful comment and feedback; and
- How OMB will ensure that administrative shifts (e.g., elimination of programs, reductions in workforce) will not impair the ability of agencies to meet their statutory and regulatory responsibilities.

¹³ See <https://www.doi.gov/pressreleases/interior-department-approves-first-solar-energy-zone-projects>

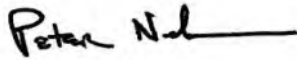
¹⁴ See https://energy.gov/sites/prod/files/2017/01/f34/2017%20US%20Energy%20and%20Jobs%20Report_0.pdf.

Thank you for considering these comments.

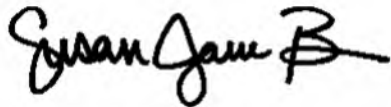
With regards,



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Cc: The Honorable Ryan Zinke, Secretary of the Department of the Interior
The Honorable Sonny Perdue, Secretary of the US Department of Agriculture