Ms. Rebecca Watson Assistant Secretary for Land & Minerals Management Department of Interior 1849 C St., NW Washington, DC 20240

January 6, 2004

Dear Ms. Watson:

I am writing you on behalf of Public Employees for Environmental Responsibility (PEER) to ask you to apply strict scrutiny to a request for approval of a reorganization that you have received from the Idaho State office of the Bureau of Land Management.

In the name of better customer service, BLM Idaho proposes to move twenty staff positions from a bustling Boise office to a remote outpost. The move is part of a statewide reorganization that would reverse cost-saving consolidations undertaken in the 1990s.

The largest element of this reorganization involves splitting the Owyhee Field Office in two with one of the new separate field offices to be located in Marsing, some 35 miles from Boise. The following consequences of the Marsing move should be highlighted:

 \cdot Contrary to better serving customers, staff would be moved away from land users, cooperating agencies and the public customer base. In fact, only four grazing permittees live in Marsing, the location to which approximately twenty staff would be relocated;

 \cdot The cost of renting, furnishing and staffing a new office in Marsing would cost an estimated \$1 million. This money will be drawn from other underfunded BLM Idaho programs;

• Hostility from Owyhee County officials has caused BLM staff to request a safety review to address concerns about assaults and lack of local law enforcement cooperation.

Despite claims of an extensive "research" effort for what BLM Idaho State Director K Lynn Bennett has termed a state-wide "organizational refinement" involving a reported "96 interviews around the state," major stakeholder groups that would be affected by the move, such as tribes, wild horse advocates, recreation enthusiasts and conservation groups were not contacted or consulted about the Marsing move.

This move to Marsing has been presented to employees as a fait accompli rather than a proposal open to evaluation. Given that the move has been requested without any meaningful evaluation of the field office's customer base, without verifying the cost of establishing and maintaining a new office and without thinking through the effects on employees and the future of BLM Idaho, the motives of this plan's author should be questioned.

The only outcome that seems certain to result from the Marsing move is that BLM Idaho will have more managers and fewer staff in the field.

The affected employees believe that, rather than a neutral reorganization, this move is a targeted political payback designed to force them to resign or prematurely retire. The move, in reality, is at the request of a very few Owyhee ranchers and politicians who want revenge against BLM range staff for doing their jobs.

In summary, PEER is asking you to short-circuit this ill-conceived reorganization. BLM Idaho cannot afford to play a million dollar game of musical chairs while neglecting gaping wildlife, range and land management needs. The losers in this move will be the vast majority of land users as well as the area's natural resources.

Sincerely,

Jeff Ruch Executive Director