

Memorandum:

To: BLM All

From: Stan Olmstead – Natural Resource Specialist

Date: September 28, 2012

Re: Last Formal Comment on the Commitment to the Mission.

Never looking through “rose colored glasses” it is obvious that we have monumental environmental concerns both in the nation and on the planet and are in need of serious solutions. The U.S. government has all the abilities to perform **state-of-the-arts** environmental management and yet we continue to fail. The land management agencies have hard-working people and they put in sincere time to perform their work. However if the Vernal Field Office is representative, there is concern in the implementation of the BLM mission. The Vernal Office has placed priority on the exploitation of public land for commodities. This effort is because of a focus on development of energy; due to a fossil fuel fixation, politics, Energy Policy Act (2005), Vernal Field Office RMP (2008), and office managers that do not understand their purpose. A quarter of the employees of the Vernal Office have a personal interest, academic knowledge, and intent to serve the American public in the performance of the mission. The mission and natural resource knowledge is their prime reason for working with the Bureau. The intent of the natural resource professional is to wisely manage habitat and fauna of public land for our citizens.

U.S. history has shown repeated failure in the care of the natural world. We place exploitation of natural resources and profits from these resources ahead of wisdom. In the past we mined, logged, grazed and exploited the natural world. Pressure on our political officials to reverse this attitude and stop deterioration of natural systems was necessary and resulted in excellent environmental laws. The U.S. has lost numerous species and yet we do not act for their ethical protection and subsequently in defense of our own healthy environment. At the Vernal Office little concern has been shown to care for sensitive species (mountain plover, sage grouse, hookless cactus). We promote energy development without stop and continue to measure natural resources by dollar value.

The mission of the BLM is *to sustain the health, diversity and productivity of public lands for the use and enjoyment of present and future generations*. As civil servants we are obligated to all Americans to perform the BLM mission. Yet our elected, appointed and agency administrators ask us to focus on commodities and economics as opposed to environmental health. Commodities and economic gains are easier to measure. We work with our elected officials but we **work for** our citizens. Outside influences that lead us away from our required service to the American citizen and the BLM mission, should be repelled by the servant. Our service to the American people is to fulfill the mission through science, law, regulations and “team work”. Our fellow civil servants that administer the Bureau should insist that we work together in a common goal to fulfill the intent of the mission. Yet the Vernal Office does not work together as a professional

team, instead the office works as fragmented groups, individually following bureaucratic requirements catering to the exploiter and political antagonist. There is little thought for the future by those in charge for real land health.

Health and diversity of public lands are natural entities. They do not include oil wells, livestock, crested wheatgrass nor guzzlers. These are developments and tools to exploit and have nothing to do with health and diversity. Productivity is not synonymous with commodities. Protection of healthy soils, vegetation, clean air & water and a natural fauna are the true products, which we should diligently promote before commodity extraction. Science teaches us to not act until we know that harm will not occur to the natural system. Whereas development asks for proof of damage to the natural system before you restrict. The natural environment and subsequently the human environment will be injured seriously if balance is not restored. U.S. federal land management agencies have it in their power to be the best land stewards anywhere in the world. We fail not in ability but in our attitude, a lack of understanding, lack of futuristic thinking and our implementation. Our actions are based on outside forces inconsistent with the intended mission and wisdom.

The BLM employee that did not study for a career in natural science frequently works for the Bureau for different reasons than the natural resource professional and it appears from experience that those who work for these different reasons are unable to visualize the intended mission. Knowing environmental health, diversity and the true customer must be known by the team before we can fulfill our service. Without a personal interest for the health of the land it is difficult to implement a professional understanding. If as some have said incorrectly that “their job was to promote oil & gas” they fail in the mission and service to the people.

Aldo Leopold had four requisites for land-health:

- 1. Cease throwing away its parts*
- 2. Handle it gently*
- 3. Recognize that its importance transcends economics*
- 4. Don't let too many people tinker with it.*

However Vernal:

- 1. Lost the mountain plover; the only known population in Utah while at the same time the species is in decline throughout its range. Little effort to prevent this loss was implemented and is a serious mission departure.*
- 2. Plugging and abandonment of well sites have not been a priority. Numerous oil & gas wells have not produced for more than 15 years and yet these sites remain un-reclaimed. Notable of these is Seep Ridge #1; Lease #U-6616 & Seep Ridge #3; Lease #U-10178-A. Why is it that after more than 20 years of non-production these two wells remain idle and un-reclaimed? Federal regulation for well abandonment (Title 43 CFR 3162.3-4) requires abandonment.*
- 3. Land reclamation after use still appears difficult to solve. What's the problem? The user wishes to profit from the land and the land is owned by the citizens.*

- Insist that the user fulfills the reclamation requirement before permitting additional use. Our only task is to identify need and confirm success.*
- 4. Animal Unit Months; we have grazing allotments, allotments have specified AUM's and grazing occurs. Yet we disturb large percentages of our allotments located in oil & gas fields and AUMs remain the same. If you lose 30% of the forage in a specific allotment it is logical to reduce the AUMs by 30%.*

In the Vernal Field Office we have shown no concern for the cumulative impact of the developed area and provide in NEPA documents little quantitative analysis. We fragment habitat extensively in energy areas resulting in ecosystem damage not unlike that which occurred from over grazing and other historic land exploitation. It took decades for government to stop over grazing and move toward land health. Today scars remain from time before the Taylor Grazing Act. We have lost the only population of mountain plover in the state of Utah, contrary to science, ethics, and policy (BLM Manual 6480 – Special Status Species Management). We have watched as direct and indirect impacts have literally killed individuals of a federally listed plant species with only a token effort to prevent future actions and not an apology for our failure. Analysis of water depletion associated with endangered fish of the Colorado River system is accomplished through a series of documented explanations that have no attempt to monitor the quantity of depletion and is inconsistent with critical habitat for the species. The air within the Uintah Basin continues to be fouled in our effort to maximize energy and economic gain. Climate change receives but token language in our NEPA documents. Socio-economics are measured on dollar values gained without analysis showing measurement of “degradation/benefit” to the community. Air quality causes respiratory ailments, traffic within the community is industrial and large sums of money leave the community to outside corporations. A myriad of other community related issues are in need of detailed analysis.

We need to alter our bureaucratic method of operation. Focus on our mission and team implementation as professional civil servants. Work together as a unified team of professionals to implement the science, law, and regulations for service to the American people. Discontinue our practice of placing our budget on projects that in truth are developments in disguise and termed mitigation. We should utilize the budget on monitoring and over-site. The use of the public land is the burden of the user to minimize injury and restore to its natural state.

Without serious fulfillment of the mission we continue to harm public land as it has been harmed so frequently in our historic past. Be honest about what is happening. It is easier to break something than to fix it, so let us stop breaking the land.

“Our Quest, is to see that we are connected to all things, that there is no separation, only in the mind”- John Mayers; Geologist.