

BY THE U.S. GENERAL ACCOUNTING OFFICE

# Report To The Secretaries Of Agriculture And The Interior

## Program To Transfer Land Between The Bureau Of Land Management And The Forest Service Has Stalled

The Bureau of Land Management and the Forest Service manage land in many of the same or nearby areas of the West. Transferring agency jurisdiction to consolidate the land into larger blocks can reduce management costs, increase management efficiency, and improve public service. In May 1980, the two agencies established a program to develop legislation for accomplishing such transfers. Preliminary estimates indicated that the program could save about \$30 million a year.

In January 1983, the joint fieldwork on the program was suspended because the two agency heads could not agree on the scope and size of potential land transfers. Another factor contributing to the suspension, which GAO noted in four of the five states it reviewed, was that field staffs frequently did not follow the program guidelines and, as a result, did not consider many transfer opportunities or did not develop potential transfer proposals consistent with program objectives.

GAO recommends that the Secretaries of Agriculture and the Interior resolve the disagreement so that the program can be resumed. GAO also recommends that once the program is resumed, the agencies instruct their field staffs to follow the guidelines and monitor their progress to make sure the guidelines are followed.



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UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

RESOURCES, COMMUNITY,  
AND ECONOMIC DEVELOPMENT  
DIVISION

B-214238

The Honorable John R. Block  
The Secretary of Agriculture

The Honorable William P. Clark  
The Secretary of the Interior

This report discusses the problems the Forest Service and Bureau of Land Management are having in implementing the Jurisdictional Transfer Program that was established in May 1980. The program was intended to identify federal lands where the transfer of jurisdiction between the two agencies has potential for increasing the efficiency and cost-effectiveness of federal land management and improving public service.

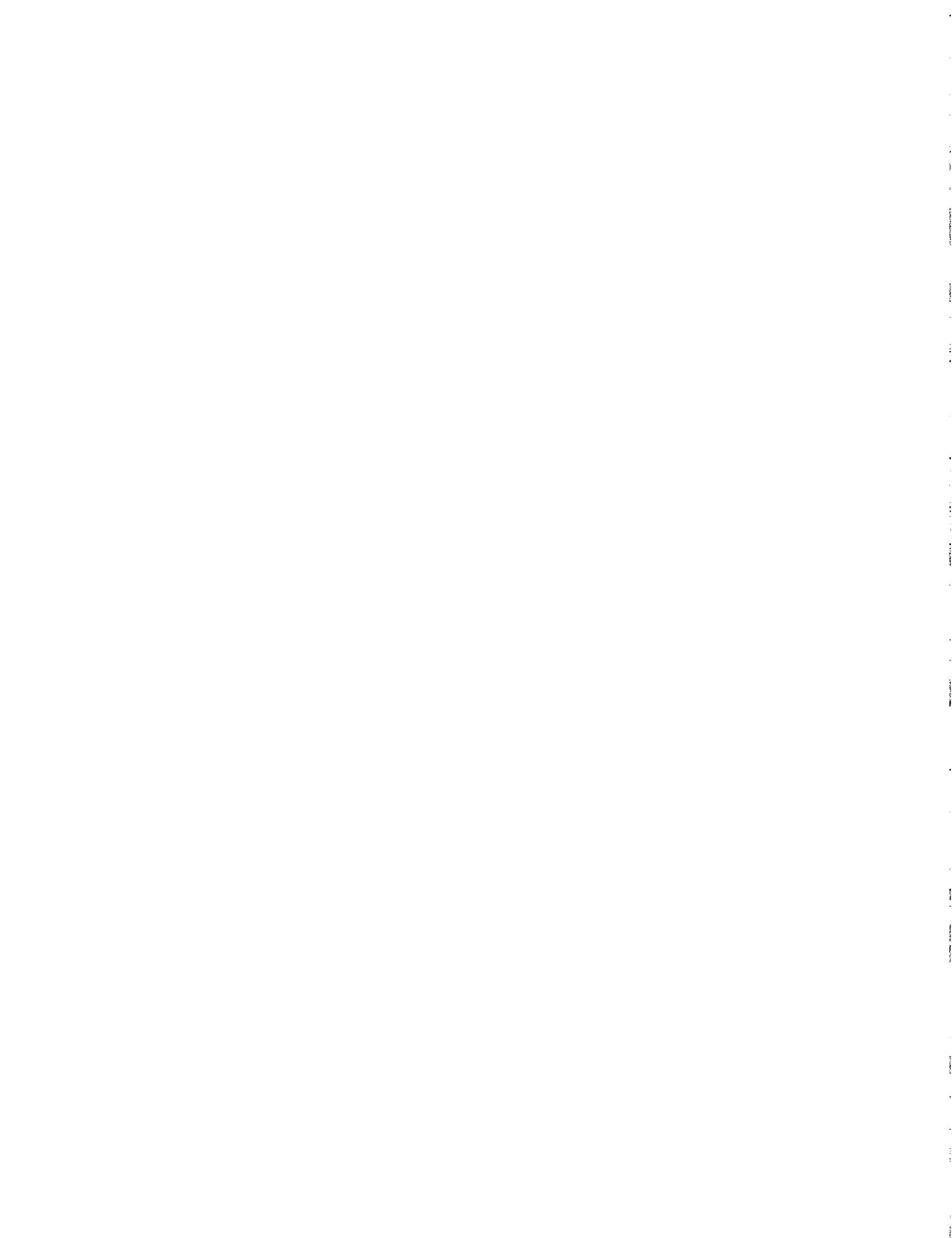
We made the review to evaluate the overall effectiveness of efforts to comply with the President's environmental message of August 2, 1979, that discussed the urgent need for cooperation between your agencies to improve coordination of the country's natural resources and permit more effective management through transfers of jurisdiction and boundary adjustments.

This report contains recommendations to you on page 42. As you know, 31 U.S.C. 720 requires the head of a federal agency to submit a written statement on actions taken on our recommendations to the House Committee on Government Operations and the Senate Committee on Governmental Affairs not later than 60 days after the date of the report and to the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

We are sending copies of this report to the above committees; to other committees and Members of Congress; and to the Director, Office of Management and Budget. We are also sending copies to the Chief, Forest Service; the Director, Bureau of Land Management; and your Inspectors General.

A handwritten signature in cursive script, appearing to read "J. Dexter Peach for".

J. Dexter Peach  
Director



D I G E S T

The federal government owns about one-third of the land in the United States, and two federal agencies--the Department of the Interior's Bureau of Land Management (BLM) and the Department of Agriculture's Forest Service--have responsibility for managing about 73 percent of the federal acreage.

Traditionally, the Forest Service managed forests, and BLM managed mostly grazing and desert land. But as a result of broadened federal policies, both agencies now can manage almost any type of land. Based on their historical land management responsibilities, however, BLM and the Forest Service manage nearby or interspersed lands in the western United States. Where this occurs, transferring agency jurisdiction to consolidate the land into larger blocks offers the potential to reduce federal land management costs, increase management efficiency, and improve public service.

The President discussed the benefits of consolidating land in his August 2, 1979, environmental message and, as a result, the BLM Director and Forest Service Chief established a Jurisdictional Land Transfer Program in May 1980. Its goal was to identify and evaluate opportunities to transfer the two agencies' land management responsibilities and develop proposed legislation to effect such transfers.

Preliminary estimates prepared jointly in 1982 by the two agencies' program coordinators indicated that about \$30 million annually could be saved through this program. (See p. 17.)

GAO reviewed how BLM and the Forest Service implemented the Jurisdictional Transfer Program because of the program's apparent potential for saving money. Between May 1983 and September 1984, GAO evaluated the program's planning, its potential benefits, and possibilities for expediting its implementation

in Oregon, California, Utah, Idaho, and Wyoming. GAO selected these 5 states because they represent the range of progress made by all 10 states in the program. (See p. 4.)

GAO found that the agencies did not meet the milestone dates they had established for developing the first legislative proposal, and joint fieldwork on the program was suspended in January 1983 because the

- two agency heads could not agree on the size and scope of potential land transfers to be included in legislative proposals to transfer jurisdiction and
- agencies' field staffs, responsible for identifying transfer opportunities and developing potential transfer proposals, frequently did not follow the jointly issued program guidelines.

Between February 1982 and January 1983, the agencies' efforts to comply with an administration initiative to identify and sell unneeded federal land also hindered program progress by diverting many needed field resources from implementing the transfer program to implementing the administration initiative. Since August 1983, the two agencies have not had to devote their field resources to this initiative. (See p. 22.)

#### DISAGREEMENT STALLED THE PROGRAM

In January 1983, the BLM Director, the Forest Service Chief, and their field staffs met to discuss and decide on potential land transfers and legislative proposals. But, after the two agency heads could not agree on the size and scope of land to be considered for transfer, joint fieldwork on the program was suspended until their disagreement could be resolved.

When the decision to suspend the joint effort was made and several times before then, the Forest Service Chief said that the proposed land transfers requiring congressional approval should involve small parcels of land, at least initially, to minimize the potential for controversy. Conversely, the BLM Director said that proposed transfers should involve large parcels of land to maximize benefits and

minimize program costs. As of August 1984, this disagreement had not been resolved, and the agencies had not worked together on the program since the January 1983 meeting. (See p. 21.)

#### PROGRAM GUIDELINES NOT FOLLOWED

The two agencies jointly developed and issued guidelines that required land pattern goals to be established showing the eventual division of land jurisdiction between the agencies and set forth specific ground rules for the field staffs to use in identifying transfer opportunities and developing potential transfer proposals consistent with program objectives. However, the agencies' field staffs in four of the five states GAO reviewed did not establish land pattern goals or follow the ground rules. (See pp. 13 and 24.)

Of the five states GAO reviewed, only Wyoming's field staffs generally followed the guidelines. The potential proposal they developed suggested the transfer of more than 3.9 million acres of land between the two agencies. At the time this proposal was prepared, the field staffs estimated that these transfers could save between \$4.2 million and \$6.3 million a year. Of the potential proposals developed in the five states reviewed, the Wyoming proposal was the most comprehensive and showed the greatest estimated savings potential mainly because of the field staffs' commitment to following the program guidelines. (See p. 36.)

#### Land pattern goals not established

The guidelines required field staffs to agree on a land pattern goal for each state that would show the eventual division of land jurisdiction between the two agencies. These goals were to provide a framework for developing potential transfer proposals. (See pp. 13-14.)

Statewide land pattern goals, however, were not established in four states for the following reasons:

- In California, officials divided the state into eight areas for study, but could not devote sufficient resources to study all areas and, therefore, completed only one of

the eight studies. The staffs also concentrated on developing proposals rather than developing land pattern goals. (See p. 25.)

--In Oregon, state BLM and regional Forest Service officials said that they did not start fieldwork until they were sure their respective agency heads were committed to the program. When they did begin fieldwork, to meet the milestone dates their agencies had established for developing proposals, the staffs relied primarily on prior transfer studies that had been done in various areas of the state. As a result, they did not study statewide land patterns or develop a statewide land pattern goal. (See p. 26.)

--In Utah, the Governor had asked staffs to delay program implementation until the state completed its work on a special project that would result in a proposal to transfer federal land to the state and exchange state land for federal land. In June 1982, when most transfer program fieldwork should have been completed, the agency heads decided that the state program should not preclude establishing a statewide goal and directed their Utah staffs to establish one jointly. The staffs made no such joint effort, but the state's BLM staff independently developed two alternative land pattern goals at the BLM Director's request. (See p. 27.)

--In Idaho, the staffs developed three alternative land pattern goals, but never established a specific goal. (See p. 28.)

Because the staffs did not establish land pattern goals in these four states, neither field nor headquarters officials had a framework for developing or evaluating alternative transfer proposals, and neither could be sure that the proposals developed would improve statewide land management patterns. In addition, the establishment of such goals might have provided the agency heads with more information on the program's potential scope that could have been useful in resolving their disagreement.

#### Ground rules not followed

The guidelines contained specific ground rules to ensure evaluation of transfer opportunities



on their merits. The ground rules were to establish provisions to eliminate existing biases and other factors that might otherwise preclude management of certain lands by either agency. Some provisions prohibited field staffs from imposing certain conditions such as requiring transfers of equal acreage, while other provisions established specific ways for handling such issues as personnel reductions or transfers and office closures or consolidations that would result from transfers. (See pp. 14-16.) The staffs in four of the states reviewed, however, did not follow these ground rules. (See pp. 28-31.)

In northeast California, Oregon, and Idaho, for example, the field staffs did not consider transfers that would result in either office closures or personnel reductions and relocations.

In California, six of eight alternative proposals for the northeast area were not considered because they would have changed existing staffing levels or required office closures. The estimated potential savings for these alternatives ranged from \$65,000 to over \$1 million annually, whereas the two alternatives considered had no estimated savings potential. Subsequently, the BLM State Director and Regional Forester rejected the alternatives developed for the northeast area because their estimated benefits were too small to be worth pursuing. (See pp. 31-33.)

#### RECOMMENDATIONS

GAO recommends that the Secretaries of Agriculture and the Interior resolve the disagreement over the size and scope of potential land transfers so the Jurisdictional Transfer Program can be resumed and legislative proposals be made. Once the program has been resumed, the Secretaries should direct the Chief and Director to:

- Instruct their field staffs to adhere to the program guidelines.
- Monitor the program's progress to make sure that the guidelines are followed. (See p. 42.)

AGENCIES' COMMENTS AND  
GAO'S EVALUATION

The Department of Agriculture agreed with GAO that the Jurisdictional Transfer Program should be continued because it offers opportunities to reduce costs, improve efficiency and effectiveness of public land management, and improve services to the public. The Department of the Interior expressed similar views, and both agencies pledged to work together and cooperate with each other.

The two Departments said that they had not disagreed over the size and scope of the legislative proposal, as GAO's draft report indicated. Interior pointed out that they could not agree on the size and scope of the program. Accordingly, GAO clarified the report to show that the disagreement was over the size and scope of potential land transfers instead of legislative proposals.

Agriculture said that, based on a joint BLM and Forest Service headquarters staff review in January 1984 of the original savings estimate for Wyoming, Forest Service headquarters officials estimated annual savings of \$1.5 million. This is 65 percent to 75 percent less than the \$4.2 million to \$6.3 million the Wyoming field staffs had originally estimated. Agriculture said that, based on this review, the overall potential savings of \$30 million should be reduced by 50 percent to prevent overstating the potential savings.

GAO's draft and final reports fully describe the basis for the overall estimated annual savings of about \$30 million as well as the January 1984 revised estimate for Wyoming. GAO notes that the January 1984 review did not consider potential savings resulting from Forest Service ranger district and BLM resource area consolidations and boundary realignments. The BLM representative who participated in the January review stated that, for these reasons, the revised estimate of potential savings for Wyoming was understated. GAO, therefore, did not change the overall potential savings. GAO recognizes, however, that the estimates were preliminary and that BLM and the Forest Service could do more in-depth analyses of the savings before final transfer decisions are made.

Both Departments suggested some editorial changes that were incorporated in the report where appropriate. (See pp. 42-44 and apps. II and III.)



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ABBREVIATIONS

|     |                           |
|-----|---------------------------|
| BLM | Bureau of Land Management |
| GAO | General Accounting Office |

## CHAPTER 1

### INTRODUCTION

The federal government owns about 730 million acres, about one-third of the total 2.3 billion acres of land in the United States. Most of the federal estate is concentrated in the western states and Alaska.

Two federal agencies share responsibility for about 73 percent of the federal estate. The Department of the Interior's Bureau of Land Management (BLM) oversees about 341 million acres, and the Department of Agriculture's Forest Service manages about 191 million acres.

### AGENCIES' ORGANIZATION AND FUNDING

BLM and the Forest Service plan and execute land management activities through decentralized organizations. BLM has its headquarters in Washington, D.C., with 12 state offices, 55 district offices, and 155 resource area offices located mostly in the western states. The Forest Service is headquartered in Washington, D.C., with 9 regional offices, 155 proclaimed national forests, 122 administrative supervisor offices, and 651 ranger district offices throughout the country. To manage federal lands and their resources during fiscal year 1983, the Congress appropriated \$427.9 million to BLM and \$1.3 billion to the Forest Service. Appropriations for fiscal year 1984 were \$432.5 million to BLM and \$1.2 billion to the Forest Service.

### AGENCIES' POLICIES AND OBJECTIVES

Traditionally, the Forest Service managed forests for their various resources, and BLM managed mostly grazing and desert lands for their resources. But, because of broadened federal policies over the years, both agencies now can manage almost any type of land.

In 1960 the multiple-use concept of diverse and balanced land use became a requirement of the Forest Service with passage of the Multiple-Use Sustained-Yield Act of 1960 (16 U.S.C. 528-531). Three other statutes also prescribed fundamental public land management policies and procedures:

- the Forest and Rangeland Renewable Resources Planning Act of 1974 (16 U.S.C. 1600 et seq.), which applies primarily to the Forest Service;
- the National Forest Management Act of 1976 (Public Law 94-588; 90 Stat. 2949), which amended and supplemented the Forest Service's 1974 Resources Planning Act; and
- the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.), which applies primarily to BLM.

This legislation requires BLM and the Forest Service to manage their public lands and associated resource values for a balance among the following three basic objectives:

- using and developing resources,
- protecting and conserving resources, and
- maintaining the quality of the environment.

The accomplishment of these objectives requires both agencies to plan and manage land use based on the multiple-use and sustained-yield principle. This principle basically means harmonious, coordinated management of all resource values on large areas of land and the best combination of diverse land uses, both developmental and protective. In planning and managing land use, the agencies must provide sufficient latitude to conform to changing needs and conditions and also consider the long-term needs of future generations for renewable and nonrenewable resources. The agencies must ensure that the productivity of the land and the quality of the environment are not permanently impaired. The principle does not necessarily mean use of all resources or the combination of uses that gives the greatest unit output or economic return.

#### LAND OWNERSHIP PATTERNS

Land ownership patterns--accidents of history that resulted from separate and unrelated land actions--complicate planning for and management of federal lands and associated resources using the multiple-use and sustained-yield principle. Except for Texas, Hawaii, and the original 13 states, most land in the United States was once owned by the federal government. The United States acquired these lands as public domain through purchase, treaties, and wars. Several patterns emerged for making these public domain lands available for development, settlement, or preservation.

National policy during most of the 19th century promoted settlement and development of the West by disposing of public domain lands to states, private individuals, and organizations at no cost or nominal cost. Between 1812 and 1935, when public domain lands were closed to private entry for individual settlers, the United States disposed of more than 1 billion acres to private individuals and organizations through land sales, homesteading of up to 160 acres for each settler's claim, and land grants to railroad companies. The grants to railroads were typically specific sections of land on each side of the railroad right-of-way, resulting in checkerboard land ownership patterns. In addition, states received millions of acres of public domain as grants to support public elementary education and land-grant colleges and universities.

While disposing of public domain lands, the Congress also set aside lands to preserve distinctive sites and provide for the general public benefit. In 1905 the Congress transferred



responsibilities to eliminate duplication and inefficiencies in 10 states:<sup>1</sup> Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, and Wyoming. Such transfers are feasible because, despite the Forest Service's historic emphasis on forestry and BLM's emphasis on grazing and minerals, both agencies are now capable of managing a wide variety of types of land for multiple uses and purposes.

During the early stages of the program's development, BLM and the Forest Service considered several methods of transferring jurisdiction of their lands, including withdrawals, executive orders, and cooperative management agreements under which one agency could conduct routine, day-to-day activities for the other agency's land. However, they concluded that such methods would not achieve the greatest management efficiency and, therefore, made the development of specific legislative proposals for jurisdictional transfers a program requirement.

The map of the western United States on page 6 shows the two agencies' land jurisdiction patterns. Maps showing land jurisdictions and office locations in California, Idaho, Oregon, Utah, and Wyoming are shown on pages 7 through 11.

#### OBJECTIVES, SCOPE, AND METHODOLOGY

As part of a 1983 survey of land exchange activities in BLM and the Forest Service, we noted that no action was being taken on the Jurisdictional Transfer Program. Because prior land transfers between BLM and the Forest Service and statements of administration officials indicated that jurisdictional transfers between the two agencies had great potential for increasing land management efficiency, saving money, and improving public service, we reviewed the program's progress in the 10 western states since its inception in May 1980. Our objective was to determine why milestones established by BLM and Forest Service top management for effecting transfers were not being met and whether the program merited continuation.

After discussions with BLM and Forest Service officials, we focused our review on efforts to carry out the program in five states--California, Idaho, Oregon, Utah, and Wyoming. Our discussions with agency officials indicated that these five states represented the range of progress made on the program and also provided examples of the types of problems BLM and Forest Service field staffs encountered in implementing the program. We made our review at the BLM state offices and Forest Service regional offices responsible for managing lands in the five states selected as well as at the BLM and Forest Service headquarters in Washington, D.C.; the Jurisdictional Transfer Program office in Lakewood, Colorado; and two BLM district offices and three forest supervisors' offices in California. California's decentralized

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<sup>1</sup>The Jurisdictional Transfer Program is not limited to any specific states; however, BLM and the Forest Service have, to date, concentrated implementation efforts in the 10 states.

administration of the national forest reserves (now designated national forests), amounting to over 85.6 million acres in 22 states, to the Department of Agriculture.

The railroad land grants and other conveyances, mineral patents, and agricultural settlement resulted in the intermingling of privately owned lands with national forest lands administered by the Forest Service and public domain lands administered by BLM.

National forest lands and BLM lands are also scattered and intermingled in many areas. Similar land areas administered by both agencies often share the same users, problems, and mandates. In many cases, the two agencies duplicate land use planning efforts, authorizations for land users, and user supervision. This situation, which can cause undue complications for the public and excessive management costs, led to the establishment of the Jurisdictional Transfer Program.

#### JURISDICTIONAL TRANSFER PROGRAM

Although the Forest Service and BLM made some large land transfers in the 1950's, each agency still manages many areas near or interspersed with land managed by the other agency. The two agencies established the Jurisdictional Transfer Program in May 1980 for transferring management responsibilities and making boundary adjustments between the agencies on selected lands. The program's purpose is to improve services to the public, improve management efficiency, and reduce the costs of doing business by adjusting BLM and Forest Service jurisdictional boundaries and transferring responsibilities for managing federal lands.

The program is the result of the President's environmental message of August 2, 1979. This message discussed the "urgent need for genuine cooperation" between BLM and the Forest Service--the two multiple-use management agencies that administer most federally owned lands--to improve coordination of the country's natural resources program. The President directed the Secretaries of the Interior and Agriculture to develop a detailed statement of coordination objectives for, among other things, boundary adjustments to permit more effective management of lands administered by BLM and the Forest Service, and a process and timetable for achieving those objectives. In January 1980, the Secretaries responded with a plan for "Coordination of Natural Resources Programs of the Department of the Interior and Agriculture" that showed action taken to develop a program to identify public lands where the transfer of jurisdiction between BLM and the Forest Service had potential for increasing the efficiency and cost-effectiveness of federal land management and benefiting the public.

The Jurisdictional Transfer Program is to develop specific proposals for transferring and consolidating land management

method of program implementation necessitated including district and forest supervisors' offices in that state. Appendix I lists the specific field offices and locations we visited.

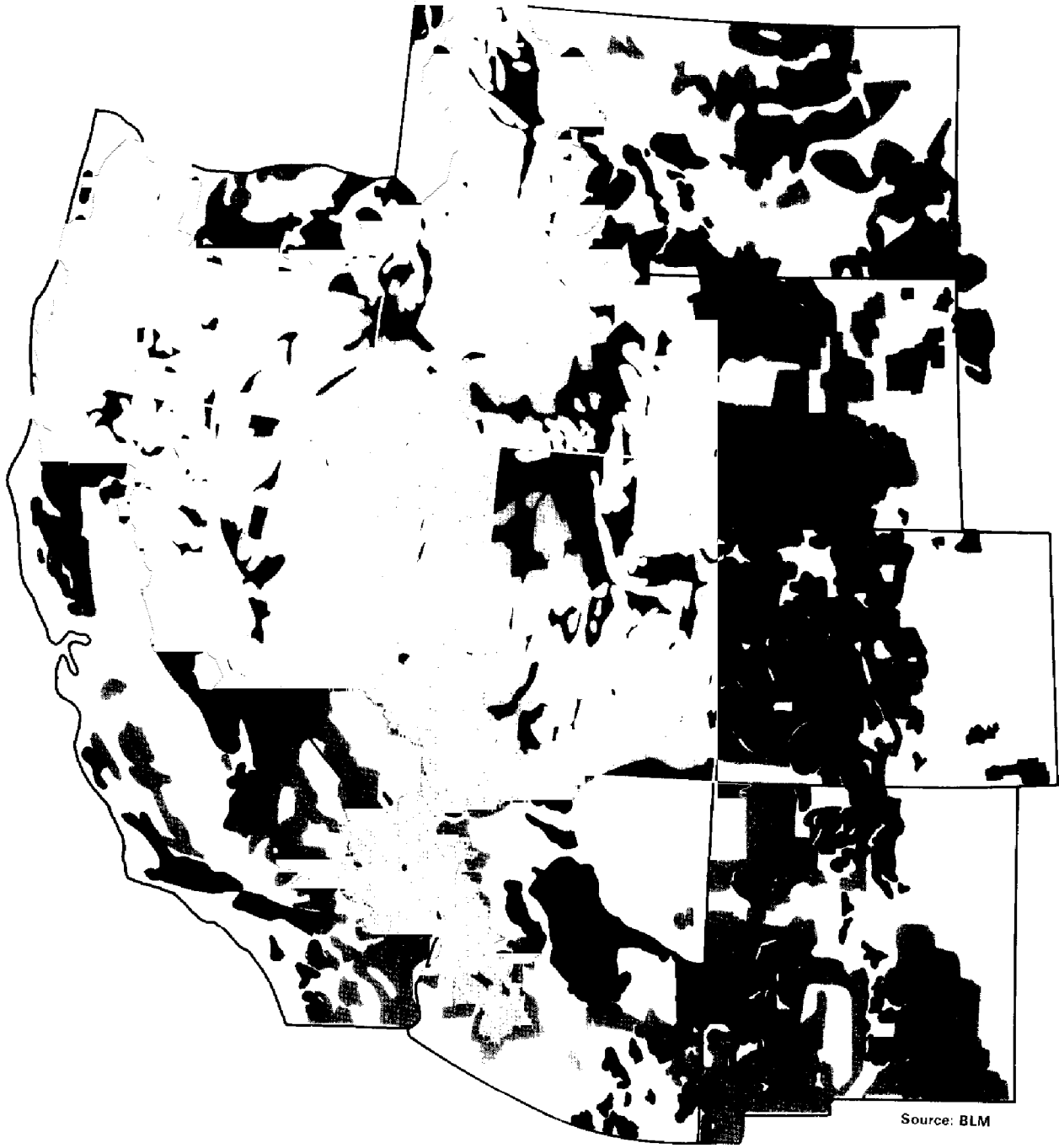
We reviewed the legislative requirements for transfers of land by the Departments of the Interior and Agriculture provided in the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.) for land managed by BLM, and the Forest and Rangeland Renewable Resources Planning Act of 1974 (Public Law 93-378; 88 Stat. 480), as amended by the National Forest Management Act of 1976 (Public Law 94-588; 90 Stat. 2949), and the Act of March 1, 1911, also known as the Weeks Act (16 U.S.C. 513-519, 521, 552, 563) for lands managed by the Forest Service. We also evaluated the impact of the President's Asset Management Program, established by Executive Order 12348 in February 1982, on the agencies' implementation of the Jurisdictional Transfer Program.

To assess the overall management and guidance for the Jurisdictional Transfer Program, we reviewed the 1979 presidential directive to the Secretaries of the Interior and Agriculture, the May 1980 interagency agreement establishing the program, and subsequent guidance provided either jointly or independently. To assess overall management support for the program, we reviewed BLM and Forest Service program planning documents. We had three separate discussions with the BLM Director and Forest Service Chief on various program aspects. We also discussed program implementation with other headquarters officials of both agencies.

At the Jurisdictional Transfer Program office in Lakewood, Colorado, we reviewed program documents and discussed overall program status, coordination, and guidance with the BLM Jurisdictional Transfer Program national coordinator. Because the Forest Service Jurisdictional Transfer Program national coordinator was on a special assignment, we held similar discussions with him at Forest Service headquarters offices in Washington, D.C. We also reviewed and discussed with the BLM national coordinator the reasonableness of the assumptions and methodology he used to prepare a nationwide estimate of potential savings from the Jurisdictional Transfer Program. Because he based these estimates on judgments and other factors that would require detailed, on-site studies for complete evaluation, we did not verify the estimates' accuracy. To obtain information on overall program status, we also reviewed certain documents available at the Lakewood program office, including all national joint BLM and Forest Service Jurisdictional Transfer Program meeting summaries, program status reports, and other program documents that reflected the status of the five states included in the transfer program, but not included in our review.

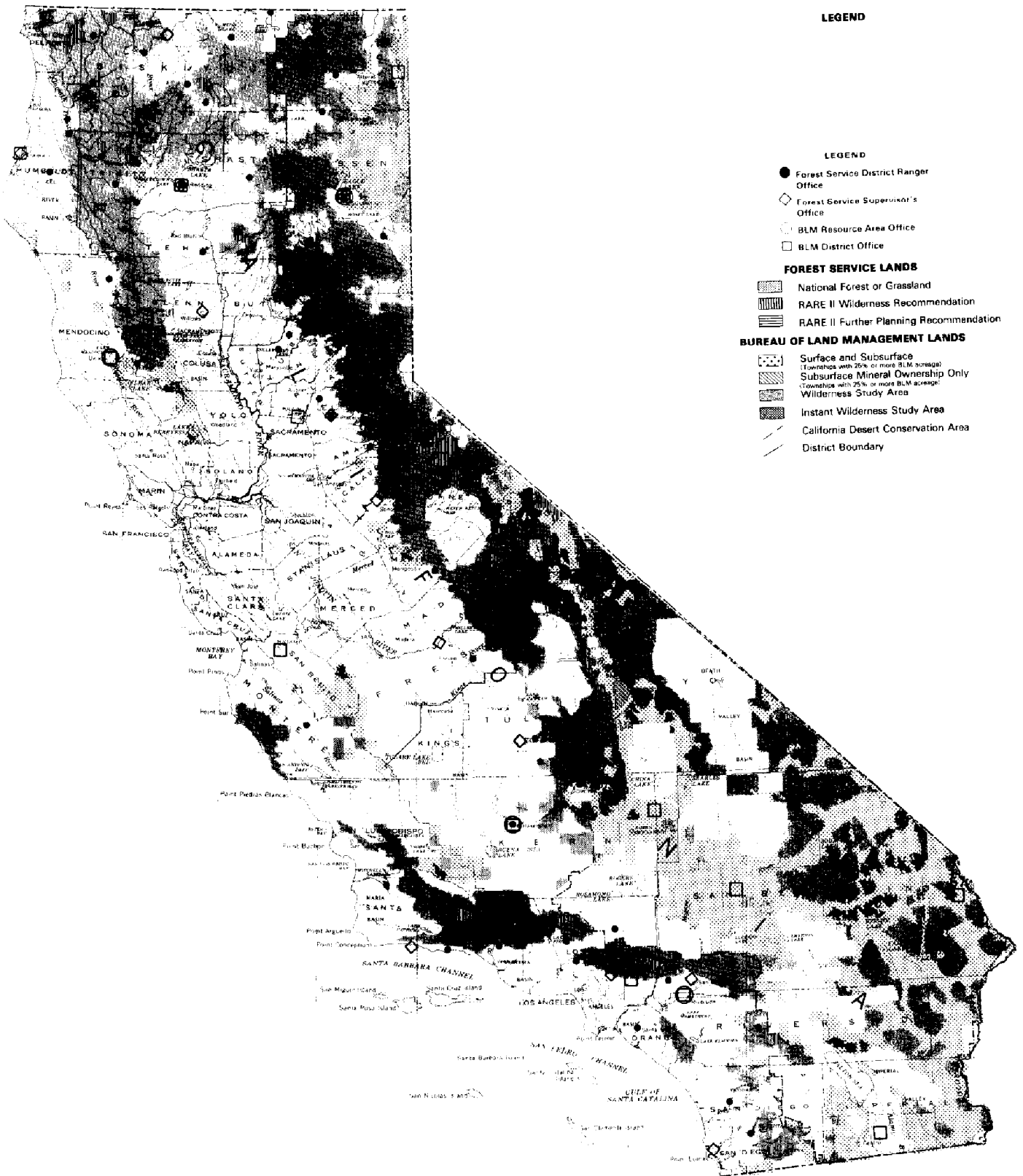
To determine the BLM and Forest Service field organizations' compliance with the program guidelines, the extent of coordination and cooperation between the two agencies, and the problems field staffs encountered in implementing the program, we reviewed pertinent program documents and interviewed BLM and Forest Service officials responsible for managing and carrying out the program at

**BLM and Forest Service Land Management Patterns  
in the Western United States**



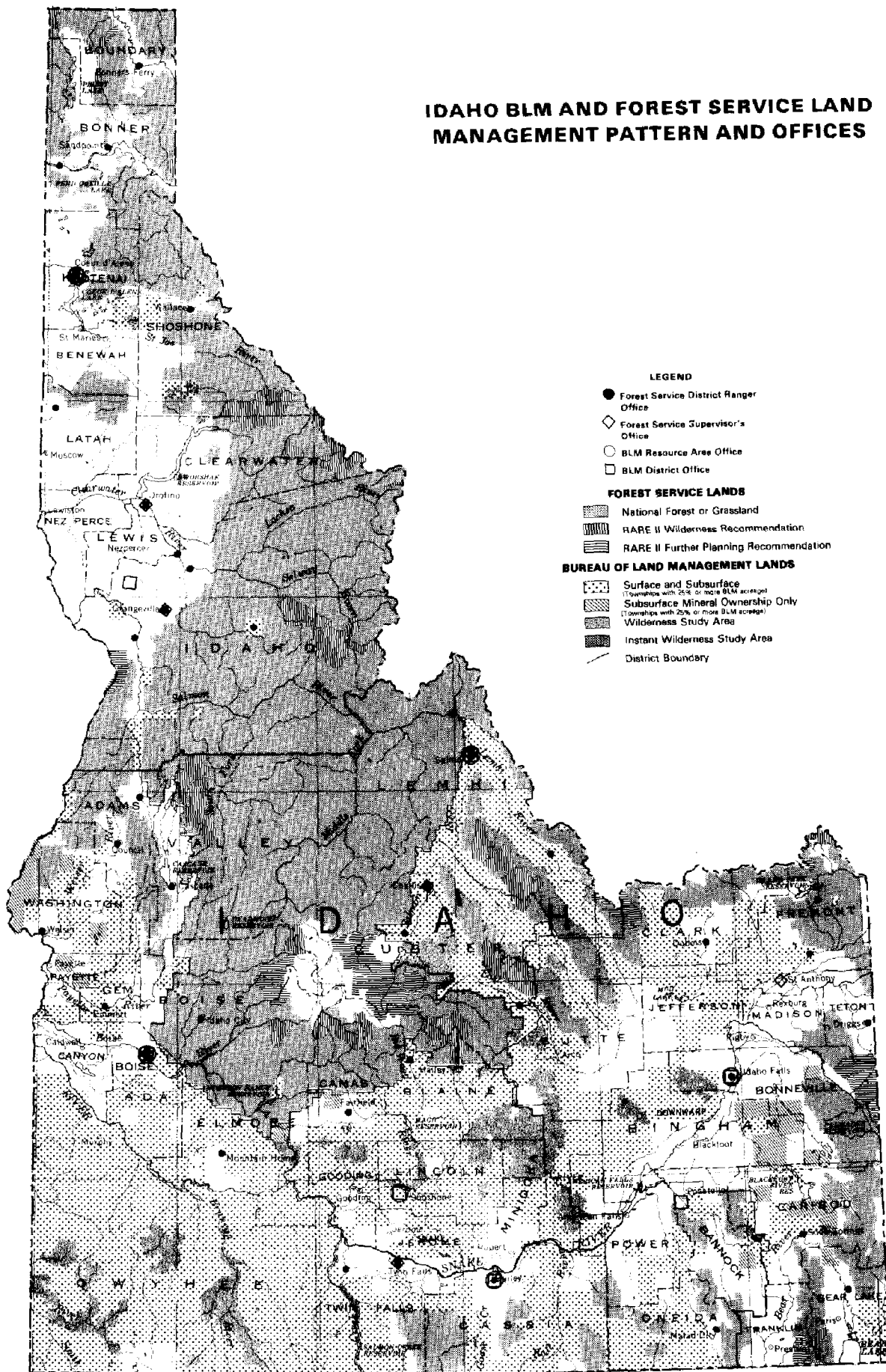
■ Forest Service  
▨ BLM

# CALIFORNIA BLM AND FOREST SERVICE LAND MANAGEMENT PATTERN AND OFFICES

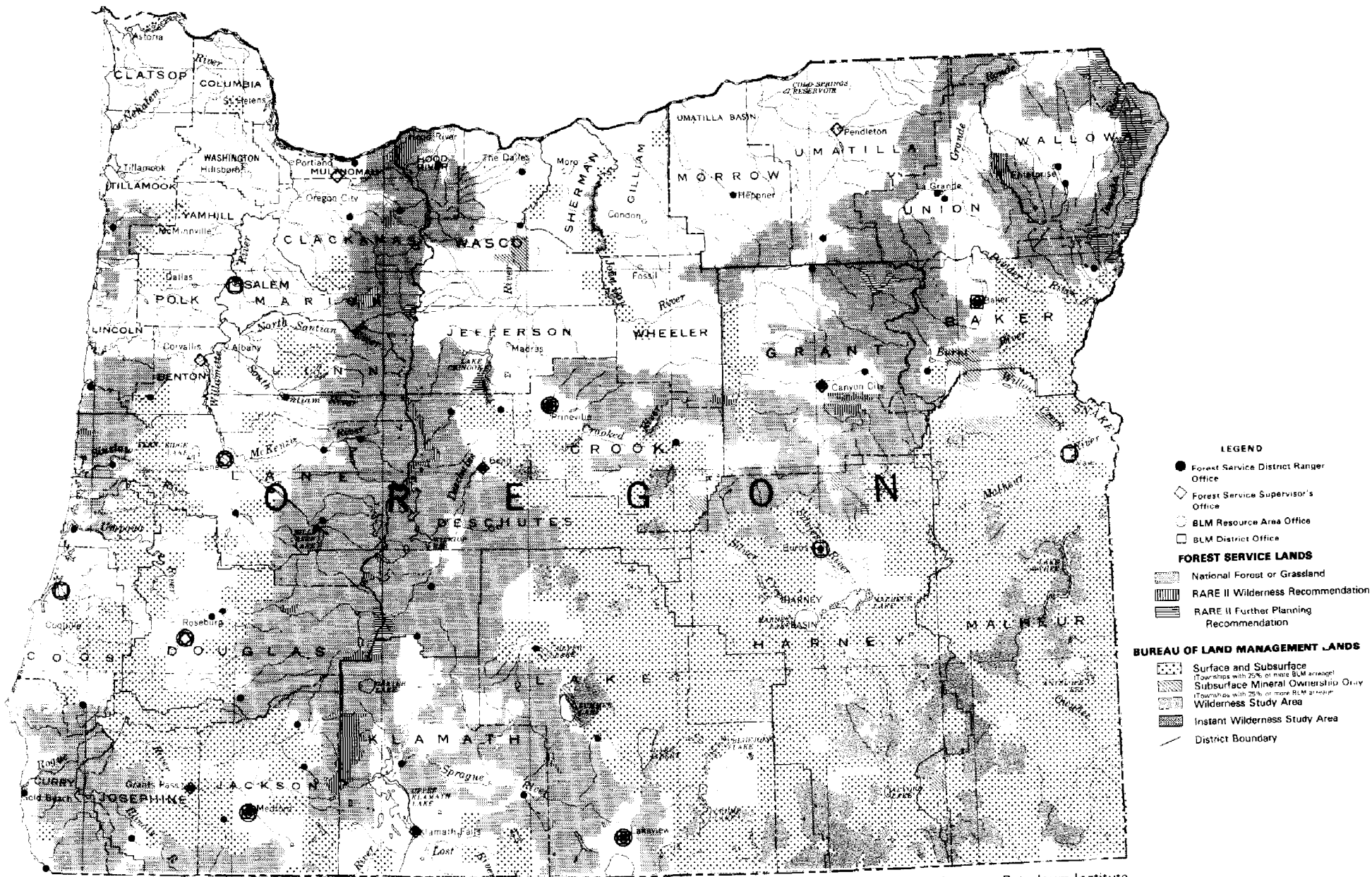


Source: American Petroleum Institute  
August 1981

# IDAHO BLM AND FOREST SERVICE LAND MANAGEMENT PATTERN AND OFFICES



# OREGON BLM AND FOREST SERVICE LAND MANAGEMENT PATTERN AND OFFICES

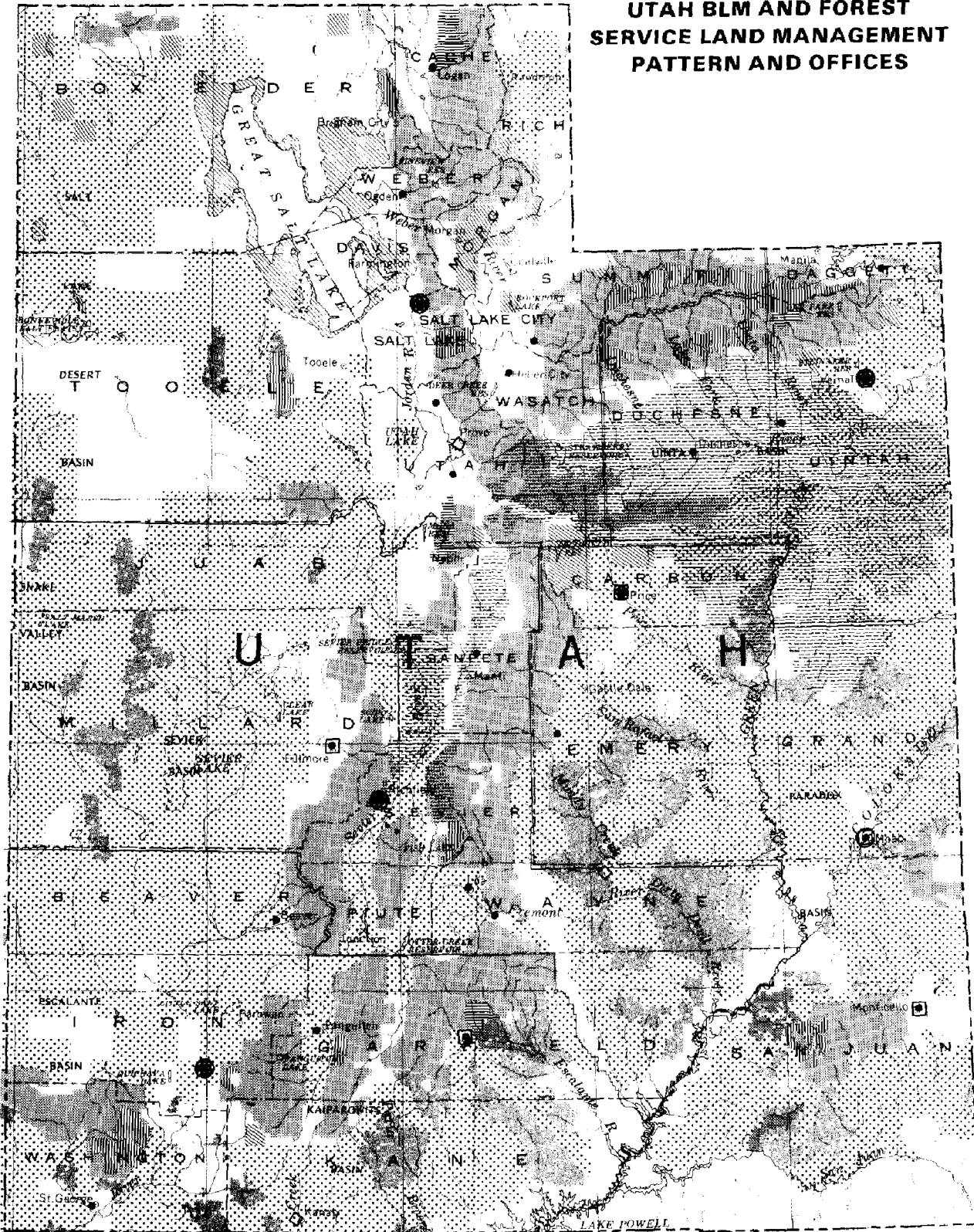


August 1981

Source: American Petroleum Institute



# UTAH BLM AND FOREST SERVICE LAND MANAGEMENT PATTERN AND OFFICES



August 1981

Source: American Petroleum Institute

### LEGEND

- Forest Service District Ranger Office
- ◇ Forest Service Supervisor's Office
- BLM Resource Area Office
- BLM District Office

### FOREST SERVICE LANDS

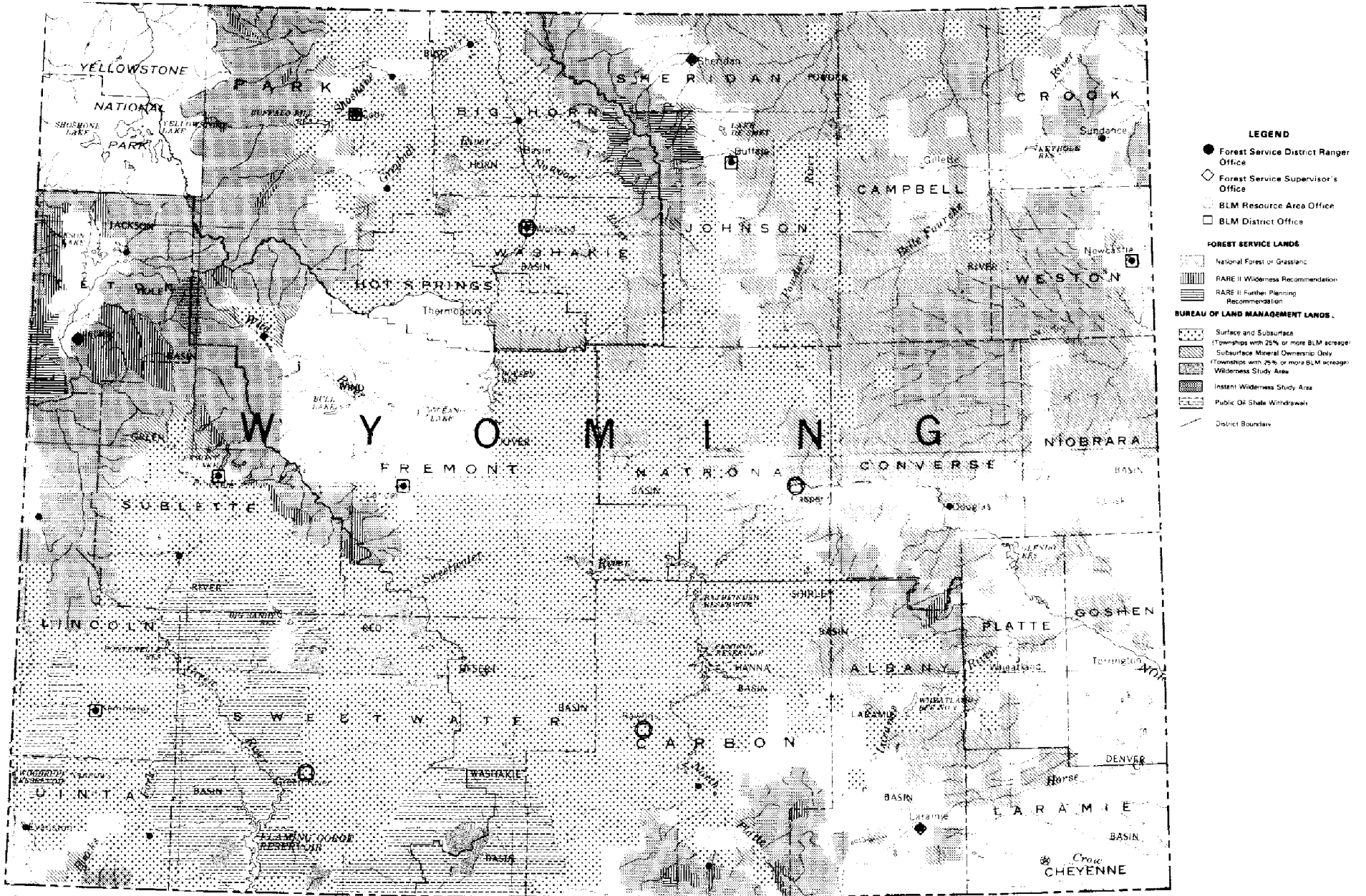
- National Forest or Grassland
- RARE II Wilderness Recommendation
- RARE II Further Planning Recommendation

### BUREAU OF LAND MANAGEMENT LANDS

- Surface and Subsurface (Townships with 25% or more BLM acreage)
- Subsurface Mineral Ownership Only (Townships with 25% or more BLM acreage)
- Wilderness Study Area
- Instant Wilderness Study Area
- Public Oil Shale Withdrawals
- District Boundary



# WYOMING BLM AND FOREST SERVICE LAND MANAGEMENT PATTERN AND OFFICES



August 1981

Source: American Petroleum Institute

field office locations we visited. The type and extent of documentation available at each location varied, but generally included such things as notes on joint BLM and Forest Service field staff meetings, methodology developed by field organizations to implement the program, local interagency agreements, briefing documents prepared for regional management, maps and studies used to identify transfer opportunities, correspondence, savings estimates, and draft and final transfer proposals. We gave special attention to the methodology used by field organizations to develop any savings estimates for potential transfer proposals so that we could attempt to judge their reasonableness but, because many assumptions were made without detailed on-site studies, we could not verify their accuracy. To provide us with an understanding of the types of land involved in the transfer program, we also viewed certain lands that had been identified or considered for transfer under the program.

We made our review between May 1983 and September 1984 in accordance with generally accepted government auditing standards.

## CHAPTER 2

### JURISDICTIONAL TRANSFER PROGRAM

#### GUIDELINES AND POTENTIAL BENEFITS

The BLM Director and Forest Service Chief established the Jurisdictional Transfer Program to transfer responsibility for managing federal lands between their two agencies to reduce the cost of managing federal land, increase management efficiency, and improve public service. To implement the program, they jointly issued guidelines in November 1981 for field staff to use in identifying and developing land transfer proposals. In September 1982, the program coordinators developed a preliminary estimate of benefits that showed the program could save the government over \$30 million annually.

#### GUIDELINES FOR IDENTIFYING AND DEVELOPING TRANSFER PROPOSALS

In November 1981, the BLM Director and Forest Service Chief jointly issued guidelines for their field organizations to follow in identifying transfer opportunities and developing potential transfer proposals. These guidelines established both a systematic process for implementing the program and specific ground rules designed to eliminate existing biases or other factors that might preclude the management of certain land by either BLM or the Forest Service.

#### Process for developing proposals

The guidelines describe a two-phase process for developing transfer proposals. First, field staffs were to study land jurisdiction in each state to identify opportunities in which both agencies managed land in the same or nearby areas. For such opportunities, they were to determine if transferring one agency's land management responsibilities to the other agency would be advantageous. On the basis of these studies, the field staffs were to develop jointly a land jurisdiction pattern goal for each state showing which agency would eventually have jurisdiction over what federal land.

The land pattern goals were to provide an overall framework within which proposed legislation could be developed and to provide a plan with which proposals could be compared to avoid conflicting or inconsistent proposals at the state level. Individual state goals were to be developed into a cohesive effort that fit with neighboring states. A consolidation process could then provide a basis for resolving goal conflicts and inconsistencies among the various states, especially for land near state lines. The state goals, subject to the Director's and Chief's reviews, would also provide a range of options for developing legislative proposals that had good potential benefits and were consistent with the overall program goal.

The second phase involved joint field staff development of potential transfer proposals or alternatives based on the land pattern goals. For each proposed transfer, field staffs were to develop information on the transfer's costs and benefits to be used as a basis for developing legislation and for subsequent agency heads' joint review and approval. The field staffs were to develop in-depth information and prepare a complete package, including proposed legislation to effect each transfer.

#### Ground rules for developing proposals

To ensure objective identification and development of land transfer proposals with maximum benefits from improved land management patterns, several inherent factors that could either result in a bias toward one of the agencies or otherwise inhibit full implementation should be eliminated. Employees' loyalty to their organizations and fear for their own or their associates' jobs, for example, could lead to studies and recommendations that would not take full advantage of transfer opportunities. Employees' reluctance to change locations could be a similar factor.

To eliminate such factors, the program guidelines included several provisions designed to make sure that, among other things, each potential transfer proposal would stand on its own merits and that the potential proposals would generally have common criteria and common data to judge how effectively the criteria are met. Descriptions of some of the more important guideline provisions appear below.

Office closures and consolidations, except for BLM state offices and Forest Service regional offices, were envisioned by the guidelines. The guidelines required these primary offices to remain as viable management units. Therefore, all other field offices--forest supervisors' offices, district rangers' offices, BLM district offices, and BLM resource area offices--could be potential candidates for closure or consolidation. Officials expected much of the program's savings to result from closing and consolidating these offices.

Balancing acreage between the two agencies was not to be used as a basis for developing or accepting any potential transfer proposal. The program guidelines specifically ruled out acre-for-acre or value-for-value considerations as criteria for judging transfer proposals. This major ground rule was to provide for objective identification and development of all land transfer opportunities to provide maximum benefits from improved land management patterns--regardless of which agency should manage the land. A proposal based on the balancing of acres, workloads, or land values would compromise the program's objectives by relegating the objectives to a secondary role.

An administrative efficiency analysis was to be made for each land transfer alternative. After the two agencies jointly developed land pattern goals for each state, they were then to analyze alternatives and process individual transfers that fit within the

goals. In making decisions on each alternative and making proposals, the field staffs were to collect, develop, and analyze cost data on the number of offices and personnel involved, changes in land management planning, and travel requirements.

Federal payments to states and counties are sometimes based on the activities conducted on federal land and the revenues generated by these activities. Under the guidelines, land transfer should not significantly affect these payments. Since local tax bases do not include federally owned lands, BLM and the Forest Service recognized the importance of, and state and local dependence on, federal payments. Since these revenues vary on the basis of activities and complex formulae, each proposal was to consider the impact on these revenues. Therefore, if a recommended transfer might adversely affect any state or county's financial returns, field staff could word the proposed legislation specifically to keep financial return rates similar to those now received.

Employee job security was recognized as an important factor for the Jurisdictional Transfer Program. The guidelines provided that mutually agreed to and mutually supported transfer proposals would offer affected employees with continuing appointments the opportunity to relocate within their agencies or, where feasible, to switch to the agency assuming jurisdiction of the land. The guidelines also required that any land transfer opportunity or proposal was to be based on its merit, which included costs and benefits associated with personnel changes. The program coordinators assumed that during the development and analysis of transfer opportunities, no proposal should be exempted from consideration because employees would be affected.

Public involvement and reaction for all transfer proposals and alternatives under the program guidelines were to be critical elements in developing and maintaining a successful transfer program. The guidelines recommended contacts and involvement by federal land managers with interested and affected parties outside the agencies to obtain their ideas, reactions, and support before processing any legislative proposal. The guidelines also recommended that land transfer alternatives indicate an analysis of their impact on the public.

Other provisions that illustrate the broadly encompassing nature of the program guidelines and that were to be followed in jointly developing land transfer proposals for a successful program include:

- Either agency has the inherent capacity to manage any lands and their resources.
- The current management level of lands (resource production and protection) will not decrease as a result of a jurisdictional transfer.

- Current management direction for areas transferred will be maintained until updated through the receiving agency's planning procedures.
- Regional foresters and state directors, prior to recommending transfer legislation, will develop a written schedule for phasing in the management responsibilities transferred.
- All work on the program will be carried out jointly, and neither agency will unilaterally seek outside support for a transfer not agreed to by the other agency.

#### LAND TRANSFERS COULD RESULT IN SIGNIFICANT BENEFITS

Implementation of the Jurisdictional Transfer Program has the potential for significant benefits for managers and users of federal lands. According to the program guidelines, the types of benefits expected to result, and the primary criteria by which transfer proposals would be judged, are

- reduced costs associated with managing federal lands,
- increased efficiency resulting in better land management,  
and
- improved service to the public.

#### Reduced costs of managing federal lands

In developing transfer proposals, regional foresters and BLM state directors were to analyze certain data to make sure that each transfer would result in net benefits to the public, the government, or both. The program guidelines required that data be collected or developed on acreages to be transferred, and on costs for offices, land management planning activities, personnel, travel, and overall management of the federal lands. According to BLM and Forest Service officials, initial field studies were to develop estimates of savings and implementation costs in each state to identify potential transfers with the greatest benefits and rank them for decisionmaking purposes. Further analysis would then be required to refine the estimates of costs and savings before proceeding with any land transfer proposals.

The detailed decisions and estimates necessary to quantify the program's potential benefits reliably have not yet been made. These decisions involve primarily the lands to be proposed for transfer, the number of positions to be eliminated, and offices to be closed or consolidated. In September 1982, the agencies' program coordinators prepared rough estimates of savings that were considered to be the upper limit. They indicated that the program could save about \$30 million annually if certain broad boundary adjustments were made and certain positions were eliminated. These estimates provided only a very general indication of the

potential savings, but were the best available indication of the program's potential to reduce land management costs. Actual savings could be more or less, depending on numerous unknown or unquantifiable factors such as the number of employees who will choose to relocate, change agencies, or terminate their federal employment when transfers are implemented.

During our review, in July 1983, the BLM transfer program coordinator devised a more detailed method than previously used to make estimates on program impact for the 10 states. He recalculated savings of about \$33 million annually, based on potential savings of \$335 million over 10 years--after deducting \$41 million for implementation costs, most of which would be incurred in the first year. The following shows the estimated savings by state:

| <u>State</u> | <u>Estimated average<br/>annual savings</u> |
|--------------|---|
| Arizona      | \$ 1,797,000                                |
| California   | 1,492,000                                   |
| Colorado     | 3,117,000                                   |
| Idaho        | 2,766,000                                   |
| Montana      | 2,555,000                                   |
| Nevada       | 1,511,000                                   |
| New Mexico   | 1,702,000                                   |
| Oregon       | 13,585,000                                  |
| Utah         | 2,559,000                                   |
| Wyoming      | <u>2,438,000</u>                            |
| Total        | <u>\$33,522,000</u>                         |

Most of the savings would be achieved by adjusting the boundaries of lands managed by BLM and the Forest Service and, thereby, consolidating the two agencies' managing units. About 1,450 staff positions out of a total of about 25,100 assigned to the lands would be eliminated as would some duplicate offices in 64 locations where both BLM and the Forest Service have offices. Personnel costs accounted for about 81 percent of the estimated savings before the deduction of implementation costs.

The BLM program coordinator based the new estimate on a general study of field office responsibilities for both agencies. Where possible, the study designated one agency to manage all BLM and Forest Service land in each county. The study also considered such other factors as office locations, staff sizes, acres managed, and potential savings through consolidation in projecting where consolidations might be made. Then, the study estimated savings and implementation costs for the resulting office closures and consolidations by using a method designed to estimate the number of positions that could be saved from consolidating local Forest Service offices. (See p. 40.) The process identified 15.1 million acres managed by the Forest Service that might be transferred to BLM and from 18.1 million to 19.4 million acres that might be transferred from BLM to the Forest Service.

The transfer program coordinators intended the September 1982 and July 1983 estimates to be broad indicators for determining the significance of benefits that might be achieved from boundary adjustments in the 10 states and to provide the agencies' management with a basis for making decisions to implement the Jurisdictional Transfer Program. These estimates were based on judgment and other factors that cannot be completely evaluated without detailed and time-consuming on-site studies. In addition, the study estimates program potential that may not be achieved if the program is not fully and vigorously implemented.

These estimates have been questioned by the Forest Service Chief, but they remain the best available indications of how much land management costs might be reduced through the Jurisdictional Transfer Program. The Forest Service Chief told us he thought the \$33 million a year estimate was too high and that some of the estimates for specific states and transfer proposals also might not be achievable. He emphasized that estimates made so far are preliminary and that more definitive estimates might be different.

Other benefits--increased efficiency  
and improved service

Services to the public and management efficiency can also be improved by transferring the jurisdiction of federal lands between BLM and the Forest Service. For example, the need for grazing permits or timber sales contracts from both agencies in certain areas could be eliminated; travel time and costs for public land users dealing with land management agencies could be reduced; the need for duplicate planning in the same general areas could be eliminated; and agency field staff time could be used more effectively in managing the federal estate. Other benefits may also accrue, such as reducing the number of federal agencies with which an individual or single political jurisdiction--such as a county--would have to deal. However, the details and extent of such benefits can be determined only after specific land transfers are targeted and data are gathered and analyzed to determine the impact of federal land boundary adjustments.



## CHAPTER 3

### PROGRAM PROGRESS STALLS

When they issued the program guidelines in November 1981, the BLM Director and Forest Service Chief established a goal that by September 30, 1982, the first legislative proposal to transfer land between the agencies would be developed. This date was missed and, in January 1983, all joint program progress stopped.

We found that three interrelated factors contributed to the program's slow progress and eventual suspension of the joint effort. These factors are:

- The heads of the two agencies disagreed on the size and scope of potential land transfers to be included in legislative proposals. According to the Forest Service Chief, small transfers should be proposed, at least initially, to minimize controversy. According to the BLM Director, large transfers should be proposed to maximize benefits and minimize costs. This disagreement was the primary reason the agencies' joint effort was suspended.
- The administration's initiative to sell unneeded federal land (the Asset Management Program) disrupted the Jurisdictional Transfer Program because many of the same lands were targeted by both programs, and resources needed to implement the transfer program were diverted to the Asset Management Program. The two agencies no longer need to devote substantial resources to the Asset Management Program, so it no longer prevents resumption of the Jurisdictional Transfer Program.
- The field staffs responsible for identifying and developing potential transfers frequently did not follow the program guidelines jointly developed and issued by the two agencies. These guidelines, when followed, proved to be successful in identifying land that could be consolidated through jurisdictional transfers. If the program is resumed, field office compliance with the guidelines will be needed to ensure development of potential proposals consistent with program objectives.

Each of these factors directly affected program progress. In addition, the factors are interrelated inasmuch as both the agency heads' disagreement and the Asset Management Program affected field office compliance with the guidelines. In turn, because field staffs often did not follow the guidelines, they could present only a limited range of options and information to top management, making agreement on a proposal more difficult.

In Wyoming, the field staffs generally followed the guidelines and succeeded in developing a potential transfer proposal consistent with program objectives. That proposal suggested the transfer of more than 3.9 million acres. At the time the proposal

was developed, the field staffs estimated that these transfers could save the government between \$4.2 million and \$6.3 million annually.

#### PROGRAM PROGRESS

At the same time the Director and the Chief issued the joint guidelines in November 1981, they also issued a joint memorandum to their field staffs that established the following fiscal year 1982 program objectives, neither of which was achieved:

- Select at least one new joint transfer proposal from each of the six Forest Service western regions by March 15, 1982.
- Submit to the program coordinators by July 31, 1982, a completed land transfer report including proposed legislation to effect each transfer.

September 30, 1982, was established as a milestone for developing the first legislative proposal to transfer land between the two agencies. Long-range goals were to complete 80 percent of all the transfers by October 1, 1985, and the entire program by the end of fiscal year 1987.

Although these milestones were not established until November 1981, the Director and the Chief provided draft guidelines for the program's implementation to BLM and Forest Service field staffs in December 1980 for their review and comment. The staffs of BLM and the Forest Service then suggested methods for identifying potential land transfer opportunities at a January 1981 meeting. The Director and Chief issued a joint memorandum in April 1981 endorsing the principles contained in the draft guidelines and instructing their field organizations to begin working on the program following the suggested methods. Thus, by the time the Director and the Chief established the milestone dates, most BLM and Forest Service field organizations had organized joint teams and had begun working on the program.

The Director and Chief planned to review overall program progress and the transfer opportunities identified by their field staffs at a joint jurisdictional transfer meeting held in April 1982. Their field staffs, however, did not complete the studies necessary to identify transfer opportunities, and by the March 1982 deadline, potential transfer proposals had been developed in only three of the six Forest Service regions.

In May 1982, the Director and Chief gave their field staffs additional time to identify land transfer opportunities and to develop potential legislative proposals. The two agency heads advised their field staffs that the opportunities and alternatives for each state would be discussed, five at each of two joint meetings to be held in June and October 1982. At the June meeting, the Director and Chief agreed to make no decisions on any

specific goals or proposals with respect to any individual state until all states had been reviewed.

The Director and Chief scheduled the next joint jurisdictional transfer meeting for January 1983 at which they planned to review state goals and decide on the specific land transfers that might be included in a legislative proposal. The Director and Chief reviewed and discussed in detail potential land transfer alternatives in 4 of the 10 states. At that meeting, they discussed approaches for implementing the program, but could not agree on the size and scope of potential land transfers to be included in legislative proposals. As a result, joint field staff work on the program was suspended. In our discussions with the Director and Chief, both continued to support the program objectives and expressed interest in resuming their efforts to carry out the program, but they had not agreed on the size and scope of potential land transfers to be included in legislative proposals. As a result, no joint progress had been made as of August 1984 toward achieving program objectives since the January 1983 meeting.

DISAGREEMENT ON SIZE AND SCOPE OF  
POTENTIAL LAND TRANSFERS CONTRIBUTED  
TO PROGRAM DELAYS

Basic differences between the Director and Chief on the size and scope of the program made it difficult for their field organizations to jointly develop potential land transfer proposals satisfactory to both of them. They both agreed that, to gain legislative approval, a proposal's benefits must exceed its processing and implementation costs, and general public support must be in evidence.

The Director said that because of the time and effort required to develop each legislative proposal, most of the benefits would be lost if many small proposals are developed rather than a few large ones. For this reason, he suggested that as few legislative proposals as possible be developed to accomplish all transfers.

The Chief, on the other hand, expressed concern that broad legislative proposals are less likely to receive the level of public support needed to gain congressional approval and suggested developing a series of small proposals, at least initially, to demonstrate their effectiveness and gain public support. He said that success of several small proposals would expedite approval of later, more comprehensive proposals.

These differences made guidance and direction given by the Director and Chief at joint Jurisdictional Transfer Program meetings appear conflicting. The Director emphasized the need for state goals reflecting maximum benefit while the Chief emphasized the need for noncontroversial transfers. At the April 1982 meeting, the Chief emphasized the need for initial transfers to have a high degree of public support. To accomplish this, he

suggested that transfers to be included in the initial proposal should have good benefits, have land transferred to and from both agencies, and not include any lands that would be likely sources of controversy. In the June 1982 meeting, the Director emphasized the need for statewide goals that would give the greatest cost savings in each state. He acknowledged risks that could be associated with the program but stressed the need to know what opportunities had the greatest cost savings.

These differences became more pronounced at an October 1982 meeting discussing statewide transfer opportunities developed in five states. At that meeting, the Chief stated that, in his opinion, the proposals he had reviewed were too large. He further stated that the statewide opportunities were not intended to be potential proposals that would be developed into legislation. On the other hand, the Director wanted statewide targets to demonstrate significant cost savings.

In January 1983, these differences finally resulted in the suspension of further joint action on the transfer program. According to the meeting agenda, the Director and Chief were to decide on specific state goals and on the first legislative proposal. Although no proposals were presented, various approaches to legislative proposals were discussed. The Director indicated that the initial proposal could include transfers in several states. This approach might also preclude attention being focused on any one state and maximum benefits could be shown. The Chief responded that such an approach added problems to the program's implementation and that he could not agree to this approach until he had studied its potential effect on things such as the statutory entity of national forests and discussed it with the Department of Agriculture's Assistant Secretary for Natural Resources and Environment, among others. He then suggested that further fieldwork on the program be suspended until he could complete his study and consultations on the BLM Director's proposed approach to implementing the program. Because further joint fieldwork on the program was suspended, BLM and Forest Service field staffs have not jointly developed in-depth information for any proposed transfer to show either the potential level of net benefits or the expected degree of public support.

ADMINISTRATION'S LAND SALES PROGRAM  
SLOWED JURISDICTIONAL TRANSFER  
PROGRAM'S PROGRESS

BLM and Forest Service officials gave as another reason for not proceeding with the Jurisdictional Transfer Program the implementation of a presidential initiative to identify government-owned land that could be sold to reduce the national debt. An Executive Order signed in February 1982 established this initiative, the Asset Management Program, and also created a federal Property Review Board within the Executive Office of the President to monitor and facilitate federal land management agencies' implementation of the sales program. The Secretaries of the Interior and Agriculture were required to report to the Property Review

Board on how the sales program would be implemented by their departments. Both were required to study and categorize landholdings quickly.

The Property Review Board also required the Secretaries of Agriculture and the Interior not to consider any lands for possible sale under the Asset Management Program to be disposed of except by sale. The Forest Service Chief said this provision precluded jurisdictional transfers of land being studied under the Asset Management Program. The BLM Director said this provision precluded only transfers outside the federal government, but the question was never resolved.

The possibility that certain lands were precluded from jurisdictional transfers created uncertainty and confusion in the Jurisdictional Transfer Program. For example, the original agreement between the Secretary of Agriculture and the Property Review Board provided that the Forest Service would not transfer any land designated for further study under the Asset Management Program until completion of the studies. Thus, the Jurisdictional Transfer Program included none of the 6 million acres the Forest Service had identified for further study. According to the program coordinators, eliminating these lands from the transfer program would make it more difficult to develop transfers showing substantial benefits and could jeopardize the entire program.

Much of the basic research to identify transfer opportunities would have been completed by the time the Asset Management Program began if the program's milestones for fiscal year 1982 had been met. However, it either was not completed or required more in-depth analysis to answer top management's questions about potential transfers. Many of the resources needed to complete the research or develop additional information were, however, diverted to carry out fieldwork on the higher priority Asset Management Program. The lack of information and available resources seemed to be a factor in the January 1983 decision to suspend the transfer program.

Another effect of the Asset Management Program on jurisdictional transfers was the Forest Service Chief's concern that the combination of the two programs would give the appearance of circumventing legislative restrictions on the sale of Forest Service land. Therefore, he was reluctant to proceed with jurisdictional transfers. Generally, the Forest Service cannot sell land without obtaining specific legislative approval to do so. BLM, on the other hand, can sell scattered parcels identified through a formal land use planning process if the sale would make effective and efficient management practical.

Although the Asset Management Program's effect on jurisdictional transfers may not have been direct and obvious, agency officials who decided to suspend the Jurisdictional Transfer Program cited the Asset Management Program as a major factor. After

August 1983, however, the Asset Management Program and the resources to implement it ceased to be factors because the Department of Agriculture eased restrictions against transferring lands identified for possible sale and the Department of the Interior curtailed the program. In addition, by that time, neither agency was devoting much of its field staff resources to implementing the program.

#### GUIDELINES WERE FREQUENTLY NOT FOLLOWED

In general, the program guidelines are reasonable, and we believe that, if they had been completely followed, the Director and Chief could have decided more easily on land jurisdiction pattern goals and transfer proposals for the 10 western states. The guidelines required that the two agencies' field staffs jointly develop and issue procedures for establishing land pattern goals to show the eventual division of land jurisdiction between the agencies. The guidelines also set forth specific ground rules for the field staffs to use in identifying transfer opportunities and developing potential transfer proposals consistent with program objectives. However, field staffs in four of the five states we reviewed did not follow the guidelines.

In California, Idaho, Oregon, and Utah, state BLM and regional Forest Service officials frequently did not follow the guidelines in identifying and developing transfer opportunities. None of the state directors and regional foresters responsible for managing their agencies' lands in these four states, for example, agreed to a statewide land jurisdiction pattern goal--one of the first steps in the guideline procedures. (See pp. 25-28.)

In addition, agency officials in three states--California, Idaho, and Oregon--added constraints that were not consistent with the ground rules and other guideline provisions and prevented consideration of certain types of transfers. In Oregon, for example, field officials did not consider potential transfer opportunities that might adversely affect either the financial returns to the state and counties or their agencies' employees. The ground rules stated that neither of these reasons should be used to eliminate transfer opportunities and provided for mitigating any undesirable effects of such transfers.

Because the guidelines were frequently not followed, some significant transfer opportunities were not recommended to the agencies' top management even though preliminary field studies showed substantial benefits might be obtained through jurisdictional land transfers. For example, estimates prepared by field staffs in California indicated that between \$65,000 and over \$1 million annually might have been saved if alternative proposals developed for the northeast area had not been eliminated because they would have required office closures or staffing level reductions.

Of the five states we reviewed, Wyoming is the only state where BLM and Forest Service staffs jointly established a statewide

land jurisdiction pattern goal and recommended potential land transfers consistent with the Jurisdictional Transfer Program objectives. The field officials suggested transfers involving more than 3.9 million acres and estimated savings of \$4.2 million to \$6.3 million a year. According to BLM and Forest Service officials responsible for managing lands in Wyoming, one of the reasons for their program's quality was the field staffs' commitment to following the program guidelines.

Statewide land jurisdiction goals were not established as required by the guidelines

Statewide land jurisdiction pattern goals were to provide the basis for jurisdictional transfers, and developing these goals was to be a basic first step in the transfer process. In two of the five states we reviewed (California and Oregon), the agencies did not complete this step because they ran short of time and resources. In another state (Utah), the agencies deferred work on the program, including development of a statewide goal, because of a state initiative to obtain federal land still due the state under its statehood act and to consolidate federal and state landholdings through exchanges. In a fourth state (Idaho), both agencies' field staffs took actions that were not consistent with the program guidelines after their agencies' managements did not decide on a goal showing which agency should have jurisdiction over lands in the southern part of the state.

Time and resource problems delayed establishment of goals in California and Oregon

The agencies' field personnel in California began planning their implementation of the Jurisdictional Transfer Program about January 1981, shortly after the two agencies agreed on draft program guidelines and a methodology. Because adequate resources could not be made available to carry out the studies needed to identify transfer opportunities in all areas of the state simultaneously, BLM and Forest Service officials decided to divide the state into eight areas. They planned, after the completion of all studies in September 1982, to combine the best opportunities identified in each area to establish a statewide jurisdictional goal.

To carry out their plan, the BLM State Director and the Forest Service's Regional Forester in California decided that preliminary studies would be done in all eight areas, and on the basis of the results of those studies, they would select the specific areas where the more detailed studies would begin. This approach would also allow them to test the process before carrying out the detailed studies in the other areas. The preliminary studies were initiated in September 1981, and in mid-1982, the BLM State Director and Regional Forester selected three areas for more detailed reviews. According to BLM and Forest Service documents, the officials selected the areas that showed the greatest potential for success.

During this same period, BLM and Forest Service headquarters jointly issued the final program guidelines along with a timetable

calling for completion of all data gathering necessary to support at least one transfer proposal in each western Forest Service region by July 31, 1982. As stated above, prior to the time frames established in November 1981, the detailed studies aimed to identify transfer opportunities in each area that would be combined into a statewide goal after completion of all studies. After the establishment of milestones, however, California field staffs changed their emphasis from developing a jurisdictional goal to developing transfer proposals. A Forest Service document shows that by June 1982, officials had completely abandoned the idea of developing a statewide goal before developing proposals. That document stated that the field officials had decided to propose transfers based on the work then underway in the three areas before studying the other five areas.

The Asset Management Program, started in February 1982, also affected the Jurisdictional Transfer Program in California. Because many of the same lands were being considered for both sale and transfer, BLM and Forest Service staffs questioned which program had priority, but received little headquarters guidance. In addition, the Asset Management Program received priority in the allocation of resources. Funds and staff planned for the Jurisdictional Transfer Program were instead used to carry out the Asset Management Program.

In Oregon, BLM and Forest Service staffs did not begin working on the Jurisdictional Transfer Program in April 1981 as instructed by the Director and Chief. Instead, they waited until the final program guidelines and milestones were issued in November 1981. They said that the delay was caused by other land management work in the state having a high priority and by the State Director's and Regional Forester's uncertainty about their agencies' commitment to the transfer program.

Because of the short time available between November 1981 and the July 1982 deadline for completing work to support a proposal, the agencies' Oregon officials concentrated on developing proposals rather than on developing jurisdictional goals. For example, they decided not to study existing land jurisdiction patterns because it would be too time consuming. Instead, they decided to rely on studies supporting previously proposed transfers. Field personnel could suggest additional transfers, but they were not directed to analyze land jurisdiction patterns jointly to identify possible improvements, as envisioned by the guidelines. Two BLM district managers told us that neither BLM nor Forest Service staff members aggressively identified all potential transfer opportunities.

Transfers proposed prior to the Jurisdictional Transfer Program generally addressed resolving local problems or increasing local management efficiency, rather than improving the overall land jurisdiction pattern. Thus, by relying on studies supporting these prior transfer proposals rather than studying overall patterns and developing a statewide land pattern goal, Oregon



officials could not be assured that their transfer proposals would improve federal land jurisdiction patterns.

Joint effort to establish goals in Utah was deferred

Utah is the only state of the five we reviewed where BLM and Forest Service officials did not work together in a joint review to establish state land pattern goals, identify opportunities for federal land transfers between the two agencies, or suggest any land transfer proposals. Before the order to begin fieldwork on the transfer program in April 1981, the Governor of Utah and the Secretary of the Interior had agreed, in March 1981, to a project under which (1) the state would select and receive about 225,000 acres still owed under its statehood act and (2) federal and state lands would be exchanged to consolidate both federal and state landholdings. Because of this effort, called Project BOLD, the Governor asked the BLM State Director and the Regional Forester to delay developing proposals to transfer land between the two agencies in Utah.

The November 1981 memorandum establishing the program milestones required development of potential proposals for only one state in each of the six Forest Service regions. Because proposals were being developed for Idaho and Wyoming, parts of which were in the same Forest Service region as Utah, Utah BLM and Forest Service officials agreed with the Governor's request and did not begin work on the transfer program. This agreement, in turn, became a basis for the field staffs' continuing to delay starting work in Utah when, after the April 1982 joint transfer program meeting, the Director and Chief requested their field staffs to develop potential proposals in all states.

In June 1982, after much of the field study in the Jurisdictional Transfer Program was to have been completed, the Director and Chief told the State Director and Regional Forester that their agreement with the Governor should not prevent them from establishing land pattern goals and directed them to develop such goals and identify land transfer opportunities in Utah. Neither the goals nor opportunities were jointly accomplished, however, before work was suspended on the program in January 1983. The assignment of all available resources to the higher priority Asset Management Program prevented needed work on the Jurisdictional Transfer Program. In addition, a change in regional foresters responsible for managing Utah Forest Service land in this same period may have inhibited such joint efforts.

Although there was no joint program effort in Utah, BLM field staff, at the Director's request, developed two alternative land pattern goals for the state. The State Director presented the proposal to the BLM Director in January 1983 and, in July 1983, to the Regional Forester in Utah for review. Since program efforts had been suspended in January 1983, the Regional Forester did not review the BLM proposal.

Field officials did not  
agree on a goal for Idaho

In April 1981, the two agencies established a joint committee to study land jurisdiction patterns in Idaho and develop a land pattern goal. The committee's October 1981 report described three alternative land pattern goals that differed only in regard to which agency should have jurisdiction over specific lands in the southern part of the state. Because BLM and Forest Service managements had not selected any of the alternatives, the committee decided to proceed with gathering additional data needed to support a transfer for the northern part of the state where the three goals were the same.

In the fall of 1982, the BLM Director requested his Idaho State Director to develop a statewide goal independent of the Forest Service, even though the guidelines required that all program efforts be conducted jointly. In September 1982, the State Director asked the Regional Forester responsible for southern Idaho to comment on the goal BLM had developed. The Regional Forester's staff studied the goal and, in December 1982, the Regional Forester advised the State Director that the proposed goal was unacceptable because the two ranger districts whose land would be transferred to BLM were cost-effective units and their transfer to BLM could jeopardize the cost-effectiveness of the entire national forest of which they were a part.

Our discussions with the Regional Forester and our review of his staff's study report showed that the study primarily examined Forest Service activities. The study did not consider overall federal land jurisdiction patterns or include an analysis of the comparative costs of one federal agency, instead of two agencies, administering the lands.

The BLM State Director for Idaho told us that, because of the Forest Service's apparent unwillingness to transfer any of its southern Idaho land to BLM and the widespread agreement that all BLM land in northern Idaho should be transferred to the Forest Service, he doubted the Forest Service's commitment to the transfer program. He indicated that he would not be willing to transfer the BLM lands in northern Idaho to the Forest Service unless the Forest Service was willing to transfer some land in southern Idaho to BLM.

Field officials added constraints that  
were inconsistent with ground rules and  
other guideline provisions

In implementing the Jurisdictional Transfer Program, BLM and Forest Service field officials frequently added various limitations or constraints that were not consistent with specific ground rules contained in the guidelines. Constraints in California, Oregon, and Idaho, for example, prohibited one or more of the following: office closures, staff reductions, and personnel transfers; jurisdictional transfer proposals or goals that seemed

as though they might affect state or local revenues; and proposed transfers that might be controversial for any reason. Factors not consistent with specific ground rules were also used by the Forest Service field staff in Idaho as a basis for rejecting a potential land pattern goal and by the BLM field staff in Utah as a basis for developing a potential goal.

Office closures, staff reductions,  
and personnel transfers

Field officials responsible for the Jurisdictional Transfer Program in California, Oregon, and Idaho took steps to avoid transfer proposals that would lead to closing offices, reducing staff levels, or changing employees' locations or agencies. These constraints were not only contrary to the ground rules as discussed on pages 14 to 16 but also to the basic thrust of the program's guidelines, which envisioned substantial savings resulting from reducing the number of local offices and the overall employment level.

As discussed previously, officials divided California into eight study areas, but only in the northeast area were all the studies completed. The northeast area study team, in considering various transfer alternatives, developed considerable information on the various alternatives' effects on individual BLM and Forest Service offices and their workloads in addition to information on potential savings and other benefits. The team used the potential impact on local office information to persuade the BLM State Director and the Regional Forester to consider further only those transfer opportunities that provided for the local BLM office to continue at its existing staff level and would not require closing any efficient ranger district offices.

In both Oregon and Idaho, program direction given to the staff discouraged them from proposing potential transfers that involved closing all offices in a community. This type of constraint allowed BLM and Forest Service offices to be combined in towns that had both agencies represented, but required that one agency or the other maintain offices in all locations that previously had an office.

In Oregon, office closures were avoided by BLM and the Forest Service because they were thought to be too controversial. For example, one BLM official, who was a district manager at the time the Oregon proposal was being developed, told us he had initially considered transferring all land in his district to the Forest Service, but further consideration of the idea was dropped because other BLM employees in the district objected to relocating. Officials in Oregon also discouraged potential transfers that might require employees to change agencies because they said such transfers might be controversial.

### State or local revenues

As discussed previously, portions of the revenue from uses of BLM and Forest Service lands are given to state and/or local governments. The percentage given to these governments varies based on the legislation under which the lands are managed. Although the ground rules contained in the program guidelines provided for legislative proposals to be written so that these revenues would not be significantly affected by jurisdictional transfers, Oregon field officials said they avoided certain potential transfer opportunities because of their concern about possible changes in state and local revenues.

A possible reduction in revenues was the main reason why the State Director and Regional Forester for Oregon decided to eliminate from consideration for possible transfer in their initial proposal a large block of specially designated land in western Oregon. This largely forest land consists of about 2 million acres that had been granted to the Oregon and California Railroad in 1866, but reverted to federal ownership in 1916 after the railroad failed to comply with the grant stipulations. Later legislation provided for the land's continued special designation, for its permanent forest management primarily by BLM, and for counties to receive higher shares of the revenues from this land than from other federal lands. The agency officials decided that the revenue differences would be a source of controversy and that only a very small amount of the railroad land should be considered for their first transfer proposal.

### Controversial transfer proposals avoided

Oregon officials based most of their decisions about potential transfers on concern about controversy possibly resulting from proposed jurisdictional transfers. In addition to being influenced by the constraints discussed above, the officials in Oregon tried to avoid controversy by keeping their initial proposal small, between 10,000 and 100,000 acres. They also decided to consider only small, isolated parcels for possible transfer.

Although the Oregon officials added several constraints because of possible controversy and adverse public reaction, they never systematically surveyed the public, as envisioned in the program guidelines, to ascertain public views about various types of jurisdictional transfers. BLM and Forest Service officials' familiarity with land management matters in the state may have provided some insight into potential controversy, and the public surveys were to have been made at a later stage of the program's implementation. Nevertheless, such far-reaching assumptions about public views should have been validated before influencing the program as much as they did in Oregon.

### Other constraints

BLM and Forest Service field staffs' use of various reasons that were not consistent with the program guidelines affected the

establishment of land jurisdiction pattern goals in Idaho and Utah. For example, the Regional Forester for southern Idaho cited two reasons for rejecting a potential goal for the southern part of the state developed by the BLM State Director. He told us that the BLM State Director's proposed goal was not feasible because it (1) would require special legislation to effect the transfer of the Forest Service land to BLM and (2) raised questions about whether BLM could effectively manage the land transferred.

Neither of these reasons is consistent with specific guideline provisions, and neither should have been used as a basis for rejecting the proposed goal. First, concern about the need for legislation to effect a transfer was not valid because the whole program was based on the assumption that special legislation would be needed to effect any transfers made as part of this program. Idaho was not unique in this regard. Second, rejecting a proposed goal based on questions about BLM's capacity to manage the land was inconsistent with the ground rule that either agency has the capacity to manage any land.

In Utah, BLM field staff used a factor not consistent with the guidelines to develop a potential land jurisdiction pattern goal for the state. BLM and Forest Service field staffs did not jointly develop potential land pattern goals or transfer proposals in Utah, but BLM staff developed two alternative goals on their own. In developing one of these alternatives, the staff attempted to balance the acreage to be transferred to each agency. A Utah BLM official told us that this alternative was developed because a goal with balanced acreage was more likely to be approved by both BLM and the Forest Service despite the ground rule that no attempt be made to balance acreage.

#### Transfer opportunities forgone

Because the field offices did not develop statewide land jurisdiction goals and field officials added constraints to their identification of transfer opportunities and development of potential proposals, the field offices suggested very limited potential transfer proposals for California, Oregon, and Idaho to their agencies' managements. The suggested California and Oregon transfer proposals omitted many transfer opportunities, and their benefits were so small that the agencies' headquarters or field offices questioned whether the transfers should be pursued. As discussed previously, BLM and Forest Service field officials did not agree on a land jurisdiction pattern for southern Idaho, at least partly because they did not fully follow the program guidelines. As a result, a potential transfer suggested for Idaho included only land in the northern part of the state and provided only for transferring land from BLM to the Forest Service, which the agencies' headquarters found unacceptable.

#### California

Of the eight study areas in California, potential transfer proposals were developed for only one--the northeast area.

Studies in the other areas either had not begun or were not completed before further joint fieldwork on the program was suspended in January 1983. Several transfer opportunities, however, identified by the study team in the northeast area were dropped from further consideration in developing the potential proposals because the BLM State Director and Regional Forester agreed to impose constraints that were inconsistent with program guidelines.

The State Director and Regional Forester selected the northeast and certain other areas for initial study because they had potential for transfers that would reduce the government's cost of managing the land and improve public service. The State Director and Regional Forester discussed the initial northeast study area report prepared by their staffs at a meeting on May 10, 1982.

This initial report proposed the transfer of about 37,500 acres from BLM to the Forest Service and about 29,900 acres from the Forest Service to BLM. According to the report, this transfer of more than 67,000 acres would result in an estimated overall savings of \$8,000 a year. After reviewing and discussing the report, the State Director and Regional Forester advised their staffs in the northeast study area that the opportunity presented in the report was too limited in scope. The State Director and Regional Forester then expanded the study area and extended the time frame so that the northeast study team would be able to consider the widest possible range of potential transfer alternatives.

During the next several weeks, the northeast study team identified 17 additional transfer alternatives that, after meetings and discussions, the team members narrowed down to 8 alternatives on which they agreed to develop detailed information. The study team discussed its analysis of these eight alternatives, completed on June 16, 1982, with the State Director and Regional Forester on July 13, 1982. At the meeting, the officials agreed to the constraints regarding office closures and staffing levels.

The constraints eliminated all but two of the eight alternatives and left the two that showed the least potential for savings. According to the information the study team developed, one of the two alternatives had no estimated savings potential, and the other showed an estimated \$2,000 increase in costs. The six eliminated alternatives had estimated savings of \$65,000 to over \$1 million a year, according to the study team analysis.

The northeast study team later identified four additional alternatives, consistent with the constraints the State Director and Regional Forester had agreed to, that were essentially minor variations of the two selected alternatives. These became the six alternatives included in the final report of the northeast study team completed in September 1982. Because the alternatives finally considered showed little or no savings, the final report of the State Director and Regional Forester concluded that none of the alternatives considered provided sufficient benefits to warrant a transfer proposal.

Because officials completed field studies in only one area in California, in-depth information about transfer opportunities in the rest of the state is not available. Rough surveys of state-wide transfer potential indicate that substantially more savings might be available than were suggested in the northeast area report. For example, the nationwide savings estimate by the two agencies' program coordinators indicated annual savings potential of \$3.2 million to \$5.6 million for California. Also, in response to a June 1982 request from the Director and the Chief for an overall estimate of savings potential in California, the State Director and Regional Forester submitted a report in August 1982 listing the most cost-effective transfer alternatives identified through preliminary studies carried out in five areas of the state. This report estimated potential yearly savings of \$1.5 million.

### Oregon

Having limited the scope of their work in identifying and developing transfer opportunities in the state, Oregon BLM and Forest Service officials managed to complete and submit an initial jurisdictional transfer proposal to the Director and Chief by March 11, 1982. As described by the State Director and Regional Forester in the letter transmitting their proposal to the Director and Chief, the proposed transfer included only those lands that would be least controversial and should most obviously be administered by the other agency.

The Oregon proposal was to transfer a total of 94,520 acres-- 78,360 acres from BLM to Forest Service administration and 16,160 acres from Forest Service to BLM. This represents less than one-third of 1 percent of the more than 30 million acres managed by BLM and the Forest Service in Oregon. According to the transfer report, the proposal would not significantly affect any existing office location or personnel numbers and skill levels. The report suggested that an additional 700,000 acres be studied further for possible future transfer. Although the proposal did not contain any specific data on potential cost savings, BLM and Forest Service staffs later estimated the cost savings associated with this proposal to be \$225,000 a year from a reduction of six staff positions and reduced travel costs.

When the Oregon proposal was first discussed on the national level at a meeting held April 13, 1982, the Forest Service transfer program coordinator pointed out that the Oregon proposal, because of its small size, would have difficulty in showing quantifiable benefits. The Director and Chief did not provide any further direction on the scope of proposed transfers at that time, other than stating that the first proposals should have both good benefits and support. Officials made no decision on any proposed transfer, including the Oregon proposal, at that meeting.

In July 1982, the national coordinators developed three alternative land jurisdiction patterns for Oregon that showed more transfer opportunities than the field proposal. The BLM and Forest Service transfer program coordinators developed these

alternatives partly in response to the Director's and Chief's June 1982 request for information showing the greatest number of acres and amount of benefits achievable through the transfer program on a statewide basis and did not intend them to be transfer proposals. The estimated maximum potential cost savings for these three alternatives ranged from \$1.6 million to \$5.6 million a year.

Discussion of the Oregon proposal resumed at the transfer program meeting in October 1982, when the Chief stated that the only criticism of the Oregon proposal was its small size and, consequently, the small amount of estimated benefits. He pointed out that the amount of benefits, in turn, raised questions about whether the transfer should be pursued.

In response to the Director's request, the BLM State Director developed two additional statewide land jurisdiction patterns and submitted them to the Director in December 1982. Broad estimates of the annual cost savings associated with these alternatives were \$1.2 million and \$2.5 million. Oregon BLM and Forest Service officials' reaction to all these subsequent alternatives, however, was that they were too broad in scope to be feasible.

### Idaho

The Idaho study committee's final report, completed in October 1981, indicated that any of three alternative land jurisdiction patterns would have resulted in substantial benefits both in increased land management efficiency and improved public service. The report stated that each alternative would significantly enlarge some national forests and BLM districts in the state and would probably eliminate others as viable administrative units. The following table shows the estimated number of acres transferred and personnel adjustments the committee estimated for each alternative:

| Alternative | Millions of acres transferred |        |       | Positions eliminated |     |       |
|-------------|-------------------------------|--------|-------|----------------------|-----|-------|
|             | To Forest Service             | To BLM | Total | Forest Service       | BLM | Total |
| A           | 3.1                           | 1.8    | 4.9   | 150                  | -   | 150   |
| B           | 1.8                           | 1.5    | 3.3   | 50                   | 25  | 75    |
| C           | 2.7                           | .9     | 3.6   | 75                   | 25  | 100   |

The report also stated that any of the alternatives could (1) reduce travel by agency personnel and the public, (2) reduce the number of duplicate permits now required, and (3) have no adverse effect on any large segment of the public even though some special interest groups such as stockmen, miners, and environmentalists could be expected to have some concerns as more specific information was developed and disseminated. Because the guidelines and the committee's plan did not provide for the detailed study and analysis necessary to develop cost information after a statewide goal had been established, the committee did not include an estimate of the potential cost savings for each alternative in its report. During early 1982, however, the BLM national program



coordinator used the information developed by the committee to develop estimates of potential cost savings of between \$2.5 million and \$6.3 million annually.

The committee presented the three alternatives to the State Director and regional foresters in August 1981. At that meeting the State Director and regional foresters decided to obtain feedback on the alternatives from Idaho BLM and Forest Service staffs and the Director and Chief. The Director and Chief, however, never indicated a preference for any of the specific alternatives developed, and a statewide goal was never established.

The committee decided that, even though a statewide land pattern goal had not been agreed to, it could begin to obtain public reaction to the transfer program as the program guidelines provided. The committee developed a public sensing effort that was carried out between January and March 1982. As a result of this effort, it received 743 responses representing various political jurisdictions, environmental organizations, land users, and other special interest groups and individuals. The opinions were mixed, but most respondents favored the transfer concept. Of the five states we reviewed, only Idaho carried out a statewide public sensing effort.

The committee met again in March 1982 and decided to begin carrying out the detailed study and analysis required to obtain the information needed for a legislative proposal. To facilitate the study and analysis, the committee divided the state into four regions. Available information showed that the 250,000 acres managed by BLM in the northern part of the state consisted primarily of scattered and isolated parcels generally surrounded by about 8 million acres managed by the Forest Service. Because both agencies' field staffs had agreed that BLM's land in the northern part of the state should be transferred to the Forest Service, and because no decision had yet been made on the preferred alternative land management pattern in the southern part of the state, the committee decided to study the northern region first.

The committee's draft analysis, completed in June 1982, showed that the federal government could save an estimated total of \$934,600 annually by transferring all BLM lands in northern Idaho to the Forest Service. The analysis estimated implementation costs at \$582,000. According to the draft analysis, the savings would consist of \$769,000 in reduced personnel costs, \$131,000 in reduced office rental costs, and \$34,600 in reduced travel costs. The only major item for which savings were not estimated was the long-term savings associated with reducing the number of land-use plans prepared. The report did not include these potential savings because both agencies were completing new land-use plans for this area and the Forest Service would manage the land following the BLM plans then in effect, as the guidelines provided. The report stated that in addition to achieving the above savings through improved management efficiencies and public

service, the proposed transfer of these lands would have little or no significant effect on the fire protection provided these lands, existing cooperative agreements, county receipts, or the economic bases of the affected communities.

Both BLM and Forest Service officials expressed concern about proceeding with an independent northern Idaho proposal before a statewide goal was agreed upon and because it did not provide for any Forest Service land to be transferred to BLM. During the April 1982 joint BLM and Forest Service jurisdictional transfer meeting, the Chief expressed reservations about transfers in one direction. He suggested that, at least for initial proposals, land should be transferred to both agencies, but that the amount of land to be transferred was immaterial. The BLM transfer program coordinator had also expressed concern about the possibility of a proposal in Idaho that would have all land transferred to one agency. He stated that such a proposal could give the appearance that the transfer program was a land acquisition program, create difficulties for the agency transferring the land to find places to relocate employees who wanted to stay with the agency, and result in employee resentment of the program.

In discussing the potential Idaho transfer at the October 1982 joint jurisdictional transfer meeting, the Chief stated that although the suggestion for northern Idaho appeared feasible and noncontroversial, it needed a transfer of Forest Service lands to BLM in the southern part of the state to go with it. The Regional Forester's rejection of the BLM State Director's goal that involved the transfer of Forest Service land in southern Idaho to BLM, however, made the possibility of BLM and Forest Service officials' agreeing on such a transfer remote.

#### Program guidelines followed in Wyoming

Of the five states we reviewed, Wyoming is the only state where BLM and Forest Service field staffs and officials jointly established a statewide land pattern goal and recommended a jurisdictional transfer proposal to the BLM Director and Forest Service Chief that presented great potential for cost savings, increased management efficiency, and improved convenience to the public. The quality of the program in Wyoming resulted primarily because the field staffs generally followed the program guidelines and did not try to protect their "turf."

Initial field estimates indicated that the proposed jurisdictional transfers in Wyoming could result in potential savings of \$4.2 million to \$6.3 million a year. The Forest Service Chief subsequently questioned these estimated savings and had them reviewed. The review report concluded that savings of about \$1.5 million a year were available based on making fewer staffing reductions than the field study had recommended.

#### Fieldwork planning and implementation

Between April 1981, when the Director and Chief advised their field organizations to begin identifying transfer opportunities,

and October 1981, the BLM State Director and two regional foresters responsible for managing Wyoming lands designated transfer program coordinators from their respective offices. At an October 1981 meeting, the three program coordinators became the transfer team and agreed to develop alternatives for future land transfer opportunities for presentation to the BLM State Director and two regional foresters by May 1, 1982. Participants at that meeting decided, among other things, that, in addition to studying statewide land jurisdiction patterns, the team should review transfer studies conducted prior to the Jurisdictional Transfer Program to determine whether their scopes, objectives, and constraints were consistent with the current program and, if so, use them as a starting point for identifying opportunities under the current program. The participants also decided that each BLM district manager and forest supervisor in the state would be contacted to obtain comments, concerns, and suggestions for potential transfers of jurisdiction.

According to the BLM State Director and one of the two regional foresters, the transfer program in Wyoming began positively as both BLM and Forest Service staffs agreed that both agencies were equally capable of managing each other's resources and that they would not attempt either to balance acreage or protect their individual agency's turf. The only constraint the team placed on the identification of transfer opportunities was that all opportunities identified had to conform to the national program objectives of improving administrative efficiency, reducing land management costs, and improving service to the public.

At its initial meeting in late November 1981, the transfer team refined the procedures agreed to at the October meeting and developed a draft action plan, including additional milestones that provided for the team to complete its data gathering, review, and analysis by April 1, 1982. Between December 1981 and early March 1982 when the transfer team met to prepare its draft report on transfer opportunities, it also (1) analyzed the agencies' existing land jurisdiction patterns both in local areas and statewide and developed potential statewide land pattern goals and (2) contacted staff of the Wyoming congressional delegation, other state offices, and at least one U.S. Senator, to provide them with general information about the transfer program.

#### Goal and proposal

The team presented its report identifying potential jurisdictional transfers in Wyoming to the State Director and regional foresters on April 23, 1982. According to the report, the team made no attempt to disregard opportunities that surfaced during its work because of known or potential political or public opposition. For the purposes of the report, the team categorized the opportunities identified as either major or minor. The major opportunities were those that the team members selected as best meeting the criteria contained in the national program guidelines and, if finalized, would affect personnel numbers and office

locations. The minor opportunities were those that probably would not significantly affect personnel numbers or office locations but might provide improved service to users or promote increased management efficiency. The report identified four major and two minor opportunities with several possible variations of some of them. At the April 23 meeting, the BLM State Director and regional foresters decided on the variations they preferred and consolidated other transfer opportunities in the report into larger transfers that would be suggested to the agencies' headquarters.

The Wyoming transfer proposal, endorsed by the BLM State Director and two regional foresters, was completed in May 1982. It established a statewide land pattern goal and recommended two major and two minor transfers involving more than 3.9 million acres to accomplish that goal. The proposal used essentially the same definitions for major and minor transfers as the transfer team's report. The two major transfers proposed involved (1) combining land now managed as two separate national forests and a BLM district into one large national forest and (2) transferring some national forest land to an existing BLM district and consolidating the remainder of that forest, along with some nearby BLM land, into another national forest. In addition to increasing the viability of all BLM and Forest Service units remaining after the transfers took place, other benefits of these two transfers identified in the proposal were:

- One BLM district office, two BLM resource area offices, two forest supervisors' offices, and two ranger district offices would be eliminated; a forest supervisor's office would also be moved to another city to be more centrally located in the larger national forest.
- The need to prepare five land management plans would be reduced. One of the major transfer areas, for example, would require only one plan where four are now required.
- Between 150 and 230 staff positions would be eliminated.
- Duplication of land user contacts would be eliminated.
- Travel requirements for land users dealing with both agencies would be reduced.
- The number of permits issued by both agencies to the same parties would be reduced.
- The general public and land users would be better served as a result of more uniform management.

The proposal estimated the potential cost savings that might be achieved through these two transfers at between \$4.2 million and \$6.3 million annually, based primarily on the savings that would result from fewer personnel and land management plans. Because the minor transfers would neither require closing any

existing offices nor significantly change the number of personnel, the proposal did not include any estimated cost savings for them. The proposal stated, however, that these transfers would probably improve both the agencies' and users' efficiency through reduced travel and improved management patterns.

After the Director and Chief could not agree on the size and scope of the legislative proposal that would be prepared and decided to suspend further work on the program in January 1983, the Wyoming proposal was not approved even though the Director and Chief did not have any specific objections to it.

#### Reasons for the program's quality in Wyoming

Our review showed that several factors contributed to the Jurisdictional Transfer Program's quality in Wyoming. The primary factor is that BLM state and Forest Service regional managers and transfer team members were equally committed to both developing a statewide land pattern goal and considering only those factors directly relevant to program objectives and ground rules in developing transfer recommendations. In addition, although the team reviewed potential transfer studies done prior to the Jurisdictional Transfer Program, it used them as a starting point for identifying alternatives in the current program and then only if the prior studies' scopes, objectives, and constraints were consistent with those of the current program.

The team members also met individually with each BLM district manager and forest supervisor in the state to obtain their comments and suggestions on the program, as well as to listen to their concerns about it. In each case, the BLM district manager and forest supervisor were encouraged to suggest a statewide proposal in addition to a proposal for the specific lands they managed. The team analyzed existing land jurisdiction patterns of the two agencies both at the local level and statewide and developed potential alternative land pattern goals for the state. Although there was no direct public participation in developing transfer alternatives, meetings with the staffs of elected public officials did not indicate any widespread opposition or objection to the program. In addition, team members completed all field studies before the Asset Management Program was implemented.

#### Savings estimate

The estimated annual savings of \$4.2 million to \$6.3 million for the two major transfers would result primarily from reducing the number of personnel and the number of land management plans to be prepared and did not involve detailed analysis of all potential savings or estimates of implementation costs. BLM state and Forest Service regional officials prepared these estimates for the purpose of targeting land transfer proposals and intended them to be preliminary estimates. According to these officials and the Wyoming proposal, detailed information on implementation costs and overall cost-effectiveness necessary for the legislative proposal

was to be compiled after the Director and Chief approved the proposal.

After the joint report for Wyoming was issued in May 1982, BLM increased its staff by 16, and the Forest Service abolished 60 positions in the affected areas of the Wyoming proposal--primarily because of a merger of the Minerals Management Service into BLM and budget cuts, respectively. Therefore, we contacted BLM and Forest Service headquarters staffs in October 1983 to ascertain whether the May 1982 data developed for Wyoming were still accurate. In November 1983, they concluded that annual savings of \$3.1 million to \$4.9 million were still achievable and that 85 to 145 positions could be eliminated. They also estimated implementation costs--not considered in the May 1982 report--of \$970,000 to \$1.2 million.

Concerned that Wyoming's estimated savings were too high and might not be achievable, the Forest Service Chief sent a headquarters team, accompanied by one BLM representative, to the Regional Forester's office in Denver, Colorado, in January 1984 to update all prior estimates for Wyoming. On the basis of that review, the Forest Service officials concluded that about 45 full-time positions could be eliminated--saving about \$1,350,000 a year--and office space rentals could be reduced--saving about \$125,000 a year. They also estimated implementation costs at \$2.6 million, mainly for moving personnel and offices. Thus, this revised estimate showed average potential savings of \$1,215,000 annually over a 10-year period after deducting implementation costs. This revised estimate of potential savings and implementation costs--based on a 3-day regional-level review, the experienced judgments of Forest Service personnel, and fiscal year 1983 data--is, according to the Chief, a more realistic estimate for Wyoming.

The January 1984 Forest Service analysis assumed that the lands to be transferred would be the same as the field team had suggested, but that there would be no initial change in local Forest Service ranger district or BLM resource area boundaries, office locations, or staffing levels. Like the original study, that analysis assumed that an office and its land could be transferred from one agency to the other. Also like the original study, it assumed the closing of two forest supervisors' offices and a BLM district office and moving an additional forest supervisor's office to another city. Unlike the original study, however, all estimated savings were attributable to the changes at the forest supervisor and BLM district office levels and none was attributable to changes at the Forest Service ranger district or BLM resource area office levels.

The original study estimated savings at all levels by using a method, contained in the 1971 Size of the Forest Policy in the Forest Service, for estimating the total number of staff reductions that might be possible when offices are consolidated. This method, used to estimate the total number of staff reductions in at least three Forest Service office consolidations that have been

implemented since the policy was issued, states that when two offices are combined, half the positions in the smaller office approximate the total number of positions that can be saved. An analysis of this method done by the BLM coordinator showed that in the three Forest Service office consolidations mentioned above, this method consistently underestimated the total positions actually saved as a result of the consolidations.

The Chief told us that no changes would be made at the ranger district or resource area office levels initially in order to ease the disruption associated with the transfer. He stated that further office location and staffing level changes might eventually be warranted, but would be made as a result of detailed efficiency analyses that would be conducted after the transfer was completed.

The January 1984 report recognized that administrative efficiency could be improved through ranger district and resource area consolidations and boundary realignments although the estimates did not include savings amounts resulting from such consolidations and realignments. The report noted that office automation and communication savings might be possible because of the reduced number of ranger district offices for which new computer and word processing equipment would be needed, and land managers might not need to travel as much if boundaries were consolidated and offices were closer to the lands to be managed. However, because such changes would not be made initially, the Forest Service analysis included no savings for these factors.

The January 1984 Forest Service report also stated that, since this regional-level reevaluation of the Wyoming estimates was limited to only 3 days, the cost and savings information from ranger district and resource area office consolidations--as well as any benefits from new ideas and improved practices and processes that might result from merging the two agencies' offices--could only be obtained by on-site data gathering and analysis at a later time. The report stated that unknown or unavailable savings and cost information could change the annual estimated savings by 25 to 50 percent, or about \$369,000 to nearly \$738,000.

The BLM representative who participated in the January 1984 study said that savings and other benefits could be achieved from ranger district and resource area consolidations and boundary realignments and, therefore, the Forest Service savings estimate is understated.

## CONCLUSIONS

The program's progress lagged and eventually came to a standstill because (1) the agency heads did not agree on the scope and size of potential land transfers to be included in legislative proposals, (2) many of the resources needed to implement the transfer program were diverted to the Asset Management Program, and (3) the field staffs did not always follow program guidelines. Both the disagreement and the Asset Management Program contributed

to field staff noncompliance with the guidelines. In addition, top managements' requests for transfer proposals to be submitted before the field staffs had developed and agreed on land jurisdiction goals disrupted the logical process envisioned in the guidelines. The disagreement and request for proposals caused confusion among field staffs and resulted in some field staffs concentrating on developing proposals rather than goals. Such goals were to have provided the basis for the subsequent proposal development.

Because the Wyoming field staffs generally followed the guidelines and successfully identified a significant land transfer that could be used for developing a transfer proposal consistent with the program objectives, we believe that the jointly developed program guidelines provided a reasonable and logical basis for the agencies to implement the program. If the program's guidelines had been completely followed, at least to the point of developing land pattern goals or alternatives for each state, then the Chief and the Director would have had more information on the program's potential scope and thus had a better basis for attempting to resolve their disagreement.

Because of the potential benefits, the Director and Chief should resolve their differences so that program objectives can be achieved. Some fieldwork needed to achieve full compliance with the guidelines, such as identifying transfer opportunities and land pattern goals, could be done before the disagreement is resolved. In fact, developing this information with no commitment to specific proposals could facilitate the disagreement's resolution. Discussions by top management could then focus on concrete transfer proposals, and any agreements could lead directly to developing information to support proposed transfer legislation.

#### RECOMMENDATIONS TO THE SECRETARIES OF AGRICULTURE AND THE INTERIOR

We recommend that the Secretaries of Agriculture and the Interior resolve the disagreement over the size and scope of potential land transfers so the Jurisdictional Transfer Program can be resumed and legislative proposals be made. Once the program has been resumed, the Secretaries should direct the Chief and the Director to:

- Instruct their field staffs to adhere to the program guidelines.
- Monitor the program's progress to make sure that the guidelines are followed.

#### AGENCIES' COMMENTS AND OUR EVALUATION

We obtained comments on a draft of this report from the Departments of Agriculture and the Interior. (See apps. II and III.) Both Departments agreed that the Jurisdictional Transfer Program should be continued and pledged to work together because the program offers opportunities to reduce costs, improve



efficiency and effectiveness of public land management, and improve services to the public. The Departments' principal comments and our evaluation are discussed below.

#### Department of Agriculture's comments

The Department of Agriculture agreed that the Forest Service should continue joint efforts to pursue the potential benefits of the Jurisdictional Transfer Program. The Department expressed concern, however, that we overstated the potential estimated savings and that we said that progress on the program had stopped because of disagreement on the scope of the legislative proposal.

The Department said that, based on a January 1984 joint BLM and Forest Service headquarters staff review of the original savings estimate for Wyoming, Forest Service headquarters officials estimated annual savings of \$1.5 million. This is 65 percent to 75 percent less than the estimated savings of \$4.2 million to \$6.3 million we cited for Wyoming. It said that, on the basis of the reduced Wyoming savings, the overall potential savings of \$30 million should be reduced by 50 percent to prevent overstating potential savings and understating funding needed to maintain an adequate level of management and public service.

Our draft and final reports fully describe the basis for the overall estimated annual savings of about \$30 million as well as the January 1984 revised estimate for Wyoming. We used this estimate because it was jointly developed by the two agencies' program coordinators. Later estimates of potential savings by the BLM coordinator indicated that greater savings could be achieved. We pointed out that the January 1984 review did not consider potential savings resulting from Forest Service ranger district and BLM resource area consolidations and boundary realignments. The BLM representative who participated in the January 1984 review stated that for these reasons, the revised estimated potential savings for Wyoming were understated. (See pp. 39-41.) We have clarified the report to recognize that the estimates were preliminary pending in-depth studies once the program is resumed and the program guidelines followed.

The Department said that it disagreed with our draft report statement that progress on the program stopped after the January 1983 joint jurisdictional transfer meeting when the two agency heads could not agree on the scope of the legislative proposal. While both agencies continued to work on the program independently after the January 1983 meeting, as of August 1984, there had been no joint meetings or cooperative field or headquarters studies, and all joint fieldwork had been suspended. We clarified the report to indicate that, as of August 1984, no joint progress had been made on the program since fieldwork was suspended in January 1983. We also revised the report to show that the program was suspended because the agencies' heads could not agree on the size and scope of potential land transfers, not because they disagreed on the scope of the legislative proposal.

The Department also said that, contrary to our view, the agencies followed the program guidelines in Idaho and Oregon. As explained in chapter 3 (see pp. 28-29), the joint BLM and Forest Service field team in Idaho took an approach that was consistent with the process established in the guidelines. However, the BLM State Director unilaterally developed potential land jurisdictional transfer goals for southern Idaho, an action inconsistent with the guidelines. The Forest Service Regional Forester for southern Idaho rejected the BLM goal, for reasons that were also not consistent with the guidelines' ground rules. In Oregon, the field staffs did not study existing land jurisdiction patterns and identify transfer opportunities based on those patterns as required by the guidelines, but relied primarily on studies that had been done before the Jurisdictional Transfer Program was implemented.

#### Department of the Interior's comments

The Department of the Interior said that the draft report generally presented an accurate account of initial efforts by BLM and the Forest Service to institute a jurisdictional land transfer program between the two agencies.

The Department said that it was confused by the terminology used in the draft report to describe the disagreement between the two agency heads that stalled the program. The Department said that rather than stating that the leaders could not agree on a legislative proposal, we should say that the agency heads could not agree on the size and scope of the program.

While reviewing the Jurisdictional Transfer Program, we noted that the agencies' staffs used different terminology to describe the steps in the process to implement the program. The last step of that process is developing legislative proposals to the Congress for transferring jurisdiction, the overall objective of the program. The disagreement between the two agency heads was on the size and scope of potential land transfers to be included in legislative proposals. We therefore clarified our report to reflect more clearly the nature of the disagreement.

The Department also said that, contrary to our views, the Idaho field staff followed the program's guidelines. The inconsistencies between the Idaho field staff's approach to implementing the program and the guidelines are discussed on pages 28 and 29.

- - - - -

The Departments' complete comments are in appendixes II and III. Both Departments made some specific editorial comments and, where appropriate, the suggested changes have been incorporated into the report.

AGENCY FIELD LOCATIONS VISITEDForest Service

| <u>Region/location</u>    | <u>National forest</u> |
|---------------------------|------------------------|
| Missoula, Montana         |                        |
| Denver, Colorado          |                        |
| Ogden, Utah               |                        |
| San Francisco, California | Inyo                   |
|                           | Lassen                 |
|                           | Modoc                  |
| Portland, Oregon          |                        |

Bureau of Land Management

| <u>Location/state office</u> | <u>District</u> |
|------------------------------|-----------------|
| Sacramento, California       | Susanville      |
|                              | Bishop          |
| Boise, Idaho                 |                 |
| Portland, Oregon             |                 |
| Salt Lake City, Utah         |                 |
| Cheyenne, Wyoming            |                 |

Jurisdictional Transfer Program

Lakewood, Colorado



United States  
Department of  
Agriculture

Forest  
Service

Washington  
Office

12th & Independence SW  
P.O. Box 2417  
Washington, DC 20013

Reply to 1420 GAO Audits

Date AUG 23 1984

Subject: Draft Report RCED-84-67 - Program To Transfer Land Between BLM and FS  
Has Stalled

To: J. Dexter Peach, Director  
Resources, Community, and Economic  
Development Division  
General Accounting Office  
Washington, DC 20540

We have reviewed the GAO draft report on the BLM/FS land transfer program and have the following comments:

We agree that we should continue our efforts to pursue the potential benefits of the jurisdictional transfer program. We support the program and believe a reasonable level of cost savings can be achieved, along with improved service to the public and management efficiency. We plan to move ahead cooperating with BLM in this effort.

The statement that program progress stopped in January 1983 when the two agency heads could not agree on the scope of the legislative proposal is simply not true. We expect to make significant progress in the next few years.

We are concerned to find that your draft report relies principally on program cost saving estimates made by the BLM Program Coordinator and that neither the Cover Summary nor Digest identified the cited \$30 million in savings as a preliminary and uncertain estimate which we do not believe can be realized.

The January 1984 joint BLM/Forest Service review of potential costs and savings in Wyoming identified about \$1.5 million in potential annual savings. This is 40 percent less than the savings shown on page 17 and from 65 to 75 percent less than the \$4.2-\$6.3 million annual savings cited on pages iii and 36.

Before any final action is decided, we believe that the entire proposal needs an adequate analysis and study to identify realistic costs and savings and assure that organizational implications have been considered. The original studies were intended to look at potential land swaps and not the organizational implications that would be involved. None of the people on the original study team were experts in staffing, organization, or workload analysis.

GAO note: Page references in this appendix have been changed to correspond to page numbers in the final report.



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The importance of a realistic analysis of costs and savings cannot be overstated. Both agencies must be able to maintain a professional level of natural resource management following any significant jurisdictional transfer. Ranger District employees are primarily on the ground workers, not overhead. One of the study guidelines was that the quality of land management would not be reduced. Therefore significant staff reductions cannot be made without reducing the on the ground capability to manage the resources and serve the public.

Based on the reduced dollar benefits identified in the January 1984 joint review of the Wyoming Transfer proposal, we recommend the estimated total program savings shown in the GAO draft report be reduced by 50 percent to prevent overstating potential savings and understating funding needed to maintain an adequate level of management and public service.

The following specific points should be changed in the audit report to make it more accurate:

The transfer program involves 14 western States, not just 10 States as cited throughout the report. Washington, North Dakota, South Dakota, and Nebraska also have transfer opportunities to evaluate.

The National Forest System administers 191 million acres rather than 187 million acres as shown in the report.

Page i, second paragraph, should be changed to read - Traditionally, the FS has managed the National Forests for their various resources and the BLM managed the public domain which was predominantly grazing and desert land. As a result of changing federal policies, both agencies have the...

Page 1, third paragraph, should be changed to read - 155 proclaimed National Forests, 122 Administrative Supervisor offices and 651 Ranger Districts...

Statements on page v and pages 29 through 30 concerning program constraints imposed in Idaho and Oregon may be overstated. We have not considered the basic program directions provided by officials in Idaho and Oregon as being contrary to the program guidelines provided by the Chief and the Director. The Idaho alternatives do include potential office closures, personnel transfers, and staff reductions. We cannot vouch for their validity without further study.


Page 40, bottom partial paragraph - We do not utilize standardized factors for Ranger District consolidations. Suggested rewording: The original study team used their own estimates of staff reductions and cost savings resulting from Ranger District consolidations. They estimated that when two Ranger Districts are combined, half the positions in the smaller

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District can be eliminated. The Forest Service headquarters reports this was a false assumption since actual experience has shown savings to be significantly less than those projected. Benefits are generally in improved effectiveness resulting from a better balance and number of skills.

We appreciate the opportunity to review and comment on this report.



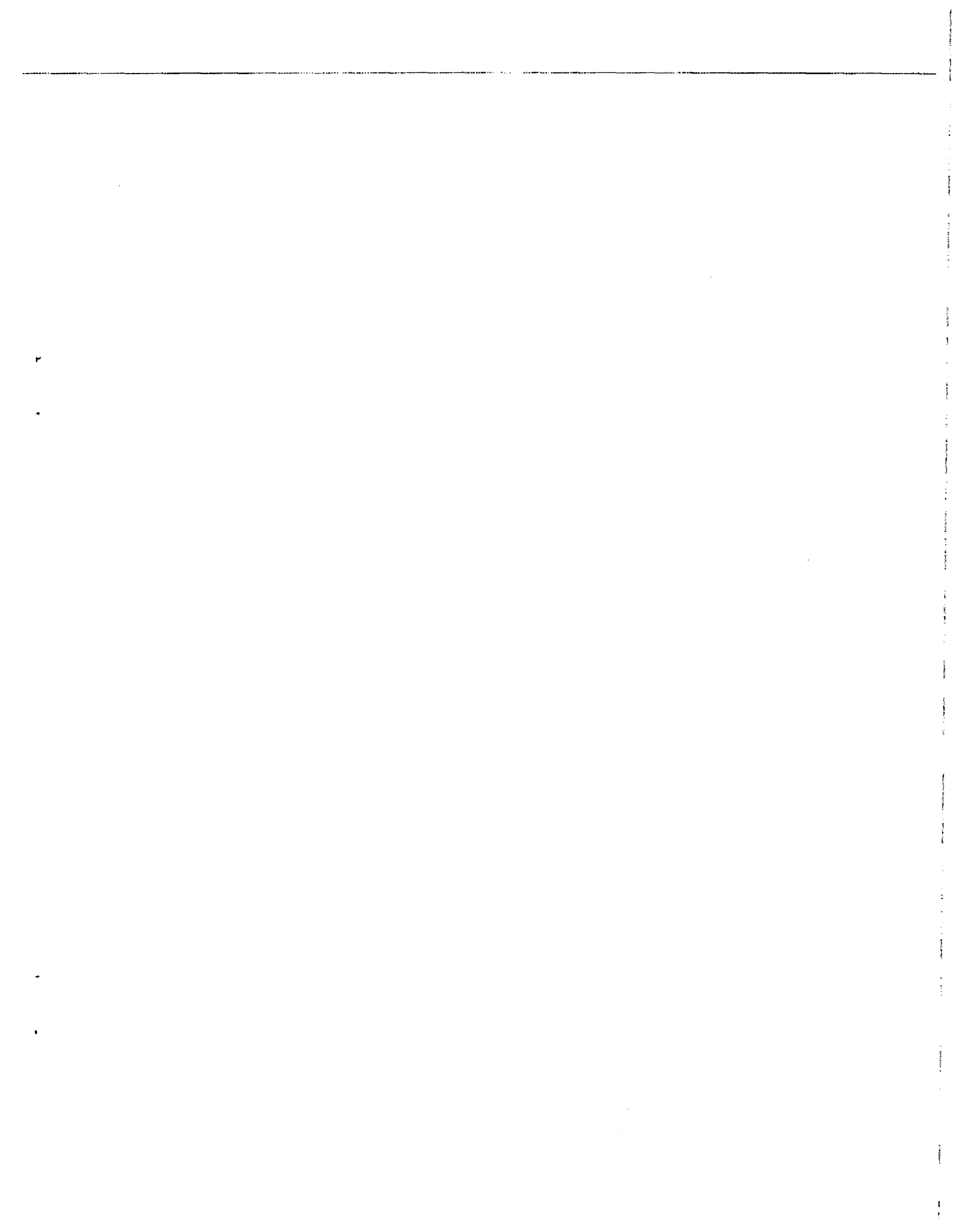
J. Dexter Peach  
District

BLM Comment: The notes of that meeting reflect that the Chief of the Forest Service asked for time to study benefits, costs, and minerals, to find out how to overcome statutory entity of National Forests and discuss a west wide approach with Assistant Secretary Crowell, the Property Review Board, and perhaps some congressional people. This might better reflect what happened by stating: "GAO found that program progress is waiting for the Chief of Forest Service to study and consult." Other pages which will need correcting are: ii, iv, 19, 21, 22, and 32.

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