
February 1, 2018

Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington D.C. 20240

Dear Secretary Zinke:

Western Governors appreciate your desire to improve the efficiency of the Department of the Interior (DOI) so that it can more effectively respond to the needs of our nation. Governors believe reform proposals should be grounded in thoughtful analysis of business practices. Additionally, we believe that carefully considered opportunities for shared services, process improvements, management changes and other administrative reforms across DOI bureaus can lead to efficiency, cost savings, improved services, and furtherance of DOI's mission.

With respect to DOI's proposal to change the bureaus' regional office boundaries, Western Governors did not have the opportunity to hear in advance the basis for DOI's proposal and consequently were not able to provide comments before the proposal was released to the public on January 10. We have attached initial questions regarding DOI's proposal to this letter.

Western Governors have – during this Administration and over time – endeavored to improve the state-federal relationship and operate as authentic partners with federal agencies (please see Western Governors' Association Policy Resolution [2017-01](#), *Building a Stronger State-Federal Relationship*). Western Governors regret that DOI did not seek input from western states on the impact of this proposal and did not seek to engage in meaningful consultation with Western Governors regarding these proposed changes. Western Governors did request an opportunity to engage with DOI on this matter in a [letter](#) to you dated April 19, 2017 (please see attached letter). Western Governors are eager and willing to work with you and your agencies on warranted changes to the Departmental structure that would meet DOI's efficiency goals while avoiding unintended consequences, which we can discuss further should you be willing to consult with us on the matter.

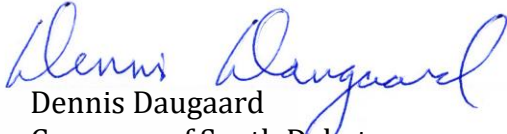
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Western Governors hope to work with DOI to improve the partnership that must exist between our state governments and DOI agencies if the land and resources of the West are to be managed responsibly. Accordingly, we urge you to delay implementation of these proposed regional boundary changes and engage with Governors about options that will both meet DOI's objectives and prove to be workable for state and local governments.

Respectfully,



Dennis Daugaard
Governor of South Dakota
Chair, WGA



David Ige
Governor of Hawaii
Vice Chair, WGA

Attachments:

- Governors' Questions
- April 19, 2017 Correspondence

**Western Governors' Initial Questions:
Department of the Interior's Proposal to Change Bureaus' Boundaries
January 31, 2018**

Western Governors have the following questions regarding the proposal of the Department of the Interior (DOI) to change the bureaus' regional office boundaries:

- What are DOI's future plans for state consultation on the proposed boundary changes?
- Does DOI intend to consult with states on other aspects of DOI reorganization?
- How did DOI assess the management and fiscal efficiencies gained by this proposal? Will DOI share its reasoning for the proposal with states?
- Why are these proposed boundary changes necessary to achieve DOI's goals of reducing conflicts among bureaus, decentralizing decision-making authority, and having a regional single point of contact?
- Six of the seven land-based DOI bureaus currently have state or regional offices with boundaries along state lines. Why has DOI deviated from the use of state boundaries in this proposal? Did DOI consider aligning the boundaries of bureau offices below headquarters by organizing those common boundaries along state lines? Has DOI compared this approach and the proposal?
- The proposed changes split Colorado, Idaho, Oregon, and Nevada into three regions and California, Montana, New Mexico, Utah, Washington, Kansas, South Dakota and Wyoming into two regions. Did DOI evaluate the proposal's impact on the ability of its bureaus to consult, coordinate, and cooperate with states?
- Did DOI consider the requirements of the Federal Land Policy and Management Act and National Environmental Policy Act in developing the proposal? Would the proposal require multiple bureau regional offices to evaluate consistency with the same state and local plans? How will this impact land use planning and environmental review timelines?
- How will the proposed changes impact DOI bureaus' appeals processes? For example, does DOI plan to maintain the current options for administrative appeals?
- Can DOI provide the Governors with a more detailed map of the proposed boundary changes?
- Are all of the proposed boundaries organized along watersheds? If there are deviations, where are they and what was the rationale for these deviations from watersheds?

Western Governors greatly appreciate your written response to these questions. These responses will help us understand DOI's reorganization process thus far and moving forward.



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April 19, 2017

Honorable Ryan Zinke
Secretary
U.S. Department of the Interior
1849 C Street, N.W., Room 6151
Washington, D.C. 20240

Dear Secretary Zinke:

The Governors of the West are proud of their significant role in governing and serving the citizens of this great nation. They recognize that the position they occupy – the chief elected official of a sovereign state – imposes upon them enormous responsibility and confers upon them tremendous opportunity. While Governors faithfully execute these important obligations, they acknowledge the critical role of the federal government and our shared goals of striving for a more perfect union.

As Governors, we recognize that each Administration will approach federalism differently and that each state must decide when and where to exercise state authorities in isolation, cooperation, or dissent of Administration policies. Because both the demarcation between state and federal roles and responsibilities and their execution can vary based on interpretation and the issue at hand, it is of utmost importance that the federal government maintain appropriate cooperation and consultation with states concerning policy development. Such consultation can help ensure that regulations do not infringe on state authority, dampen innovation and impair on-the-ground problem-solving.

Western Governors are encouraged to learn that President Trump's February 24, 2017 Executive Order (E.O.), *Enforcing the Regulatory Reform Agenda*, will require federal agencies to critically examine their regulatory processes. We especially appreciate the E.O.'s explicit requirement that federal agencies seek input and assistance from states. Western Governors request the opportunity to participate – either by representation on the task force or otherwise – in the Interior Department's Regulatory Reform Task Force review. We believe the Western Governors' Association's (WGA) Resolution [2017-01](#), *Building a Strong State-Federal Relationship*, is a good starting point for that conversation.

Western Governors also wish to note our great interest and equities in the E.O. requesting a *Comprehensive Plan for Reorganizing the Executive Branch*. Local, state and regional divisions of the federal government offer important services to the citizens of our states, support employment opportunities in our

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communities, help facilitate the delivery of federal financial assistance programs, and play an important role bridging and reflecting local knowledge, experience and expertise in federal policy decisions. Western Governors request consultation to ensure critical policy, program and agency consolidation and reorganization decisions remain cognizant of these interests.


States are responsible for executing all powers of governance not specifically bestowed to the federal government by the U.S. Constitution. This reservation of power to the states respects the differences between regions and peoples. It recognizes a right to self-determination at a local level. It rejects the notion that one size fits all, and it provides for a rich tapestry of local cultures, economies and environments. States regularly engage in a kind of cooperative competition in the marketplace of ideas. Western Governors are leaders in innovative governance who employ their influence and executive authority to promote initiatives for improvement of their states' economies, environments and quality of life.

Western Governors are excited to work in partnership with the federal government. By operating as authentic collaborators on the development and execution of policy, the states and federal government can demonstrably improve their respective service to the public. Western Governors are optimistic that the new Administration will be eager to unleash the power and creativity of states for the common advantage of our country. By working cooperatively with the states, the Administration can create a legacy of renewed federalism, resulting in a nation that is stronger, more resilient and more united.

Thank you for your consideration of our request. The Western Governors' Association stands ready to help coordinate the participation of Western Governors in this very important effort.

Sincerely,


Steve Bullock
Governor of Montana
Chair, WGA


Dennis Daugaard
Governor of South Dakota
Vice Chair, WGA

cc: Mick Mulvaney, Director, Office of Management and Budget
Justin Clark, Director, White House Office of Intergovernmental Affairs