

To: Smith, Linda[lhsmith@blm.gov]
Cc: Tonya Jackson[tmjackson@blm.gov]; Wayne Allen[wsallen@blm.gov]; Michael Jackson[MichaelJackson@blm.gov]; Adams, Lark R[ladams@blm.gov]; Joseph Mendez[jmendez@blm.gov]; Anita Bilbao[abilbao@blm.gov]; Edwin Roberson[eroberso@blm.gov]; Tiffany Martinez[tmartine@blm.gov]
From: Bastian, Randall (Randy)
Sent: 2017-07-10T12:20:07-04:00
Importance: Normal
Subject: Re: BLM-Utah FY18 PTA Feedback
Received: 2017-07-10T12:20:30-04:00
Utah FY18 PTA Formal App Response 7-7-17.docx

See attached.
rb

On Mon, Jul 10, 2017 at 6:37 AM, Smith, Linda <lhsmith@blm.gov> wrote:

Thanks, Randy. Please forward the Word docs.

On Fri, Jul 7, 2017 at 7:10 PM, Bastian, Randall (Randy) <rgbastian@blm.gov> wrote:

All,
Attached is BLM-Utah's FY18 PTA feedback.

Any questions, please contact me.

Regards,

Randy

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Phone: (801) 539-4238 Fax (801) 539-4222

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IN REPLY REFER TO:

1681 (UT-952)

Memorandum

To: Director (WO-880)

From: State Director

Subject: BLM Utah's FY 2018 Planning Target Allocation (PTA) Feedback

This memorandum transmits BLM Utah's formal appeals and provides overall feedback related to the FY 2018 PTA proposed funding allocations.

BLM Utah has reviewed the General Directives, Crosscut Directives and Program Directives as well as the Allocation worksheets for the FY 2018 PTA. Reductions in the FY18 PTA allocations are higher than anticipated, based on the May 8, 2017 Instruction Memorandum 2017-076 (Updates to Operational Workforce Plans and Tables of Organization).

Three formal appeals are attached. Additional concerns are:

- There is insufficient funding for labor. BLM Utah's projected FY 2018 labor to operations ratio is 87% to 13%. Numerous programs received reductions in Basic funding, which covers labor. In addition, earmarks tied to "Basic Funding project lists" were increased from FY 2017 levels, again restricting funding available for labor.
- L1060 is not available to cover overhead. This will require other subactivities contribute more to overhead costs. BLM Utah requests dialogue regarding the L1060 directive to alleviate this restriction.
- There is not additional funding for oil & gas programs to BLM Utah as a high priority energy State. BLM Utah requests additional funding to support our energy and minerals staffing plan. Specifically, we request funding to cover BLM Utah's 2018 staffing plan submitted in response to IM 2017-076, an Energy Support Team (leasing emphasis; located at the State Office – 1310), and an Energy Knowledge Center (permitting emphasis; located at the Green River District – 1310/1314/1320). Investment in these three requests will increase BLM Utah's skill and ability to meet energy related workload now and in the future.

We appreciate the opportunity to review and provide feedback on the PTA process. Respectfully, BLM-Utah requests WO review the Budget Schedule going forward and to provide additional time to the States (e.g., a minimum of 10 working days).

For questions or additional information, please contact Randall Bastian, Utah Budget Officer, (801) 539-4238.

Attachments

- 1 – Utah's FY 2018 Formal Appeal Summary (2 pgs.)
- 2 – Utah's FY 2018 Individual Appeal Templates (7 pgs.)
- 3 – Utah's FY 2018 Oil & Gas/Energy Support Team Proposal (4 pgs.)

UTAH FY 2018 PTA - SUMMARY OF APPEALS

Cost Center: Utah

Point of Contact: Randy Bastian

Phone #: 801-539-4238

Email: rgbastian@blm.gov

1. Issue of concerns where there is agreement with the WO program directorate regarding the resolution. (Add extra lines as necessary)

Appeal #	Subactivity	Brief Description of Concern	Amount	Brief Description of Proposed Resolution

2. Issue of concern where there is not agreement with the WO program directorate regarding resolution

Appeal #	Subactivity	Brief Description of Concern	Amount	Brief Description of Proposed Resolution
U-UT-1	L1020	L1020 – Rangeland Mgmt - reduction of \$ 1.1 million (18%) – <i>* See specific details in Attachment 2-1</i>	\$ 1.1 m	Utah is requesting at a minimum \$ 1.1 million funding level for FY 2018 Utah 1020 is seeking funding at the 2017 AWP level. <i>* See specific details in Attachment 2-1</i>
U-UT-2	L1050	Insufficient funding for the Four Corners – Cerberus project. Identified funding levels are not adequate to sustain the labor, operations, building lease, artifact curation, and tribal consultation efforts. Consistent with the PTA, L1630 is no longer a funding source for this project. <i>* See specific details in Attachment 2-2 thru 2-4.</i>	\$85,000	An additional \$85,000 is needed to cover the essential labor and operations in FY2018. The Utah State Office would allocate the additional funding to: <ul style="list-style-type: none"> ▪ Cover the Museum Collection Manager’s labor costs and travel. ▪ Implement the Cerberus Collections Interpretative Plan to establish consistent messaging related to the social and scientific consequences of looting archaeological resources and to promote a message of respect for Native Americans’ cultural heritage. ▪ Transfer collections materials to other jurisdictions, non-federal repositories, and other BLM states for curation.
U-UT-3	L1310 L1314 L1315 L914*	The basic funds available under the PTA are inadequate to cover BLM Utah’s permanent	\$ 3.3 m	The FY2018 PTA did not include an increase in funding in oil & gas programs. BLM Utah is requesting

UTAH FY 2018 PTA - SUMMARY OF APPEALS

		<p>labor costs for L1310, L1314, L1315, L9141</p> <p><i>* See specific details in Attachment 2-6 thru 2-7.</i></p>		<p>\$ 2.5 million in oil & gas programs to cover the projected shortfall of labor costs. We are also requesting additional funding of \$ 383,000 for the Utah State Office Leasing Team and \$ 672,000 for the Energy Knowledge Center (permitting emphasis).</p> <p>The number of APDs expected are not likely to cover on board personnel. Funding in L1310 may be more appropriate to cover labor costs.</p> <p>The proposed resolution would provide BLM Utah with the minimum funding necessary to maintain a workforce capable of accomplishing requirements under law and policy.</p>
U-UT -4	L1711	<p>The basic funds available under the PTA are inadequate to cover BLM Utah's permanent labor and critical operational costs for L1711.</p> <p><i>* See specific details in Attachment 2-6 thru 2-7.</i></p>	\$1.14 m	<p>The FY2018 PTA includes a \$1.6 million reduction in BLM-Utah's L1711 program, and Utah is requesting an additional \$1,140,000 in L1711 to cover the projected shortfall of labor costs. The proposed resolution would provide BLM-Utah with the minimum funding necessary to maintain a workforce capable of accomplishing requirements under law and policy.</p>

BLM Utah FY 2018 PTA Individual Appeal Description

Appeal # U-UT-1

Subactivity: L1020 – Rangeland Management

Brief Description of Concern: L1020 – Rangeland Mgmt - Utah reduction of \$ 1.1 million

Explanation: The 2017 AWP for 1020 was \$6,569,000. PTA for 2018 is proposed to be funded at \$5,386,000. This is a reduction of \$1,183,000 or 18% from 2017 AWP.

Justification: The need to eliminate this reduction is critical in completing critical work within the 1020 program. Implementing the reduction would be a loss of about 10 positions in the range program.

Context: Historically, Utah has seen fluctuations in AWP numbers in the range of a few hundred thousand dollars. Utah has been able to adjust to this via lapse and one time funding. However, a \$1.1 million dollar reduction is too large to overcome even with not hiring vacant positions.

Impact (use actual data to the extent possible): Impacts from a \$ 1.1 million dollar reduction from the 2017 AWP are three positions currently vacant but funded in the Utah PTA would not be filled for a savings of around \$300,000. 2) This would still leave the Utah 1020 program with no funding for 7 to 8 Rangeland Management Specialist positions currently occupied. Not being able to fund these positions would reduce the completion of priority PE targets. For example, Utah would see a loss of roughly 30% (50-70) ML (monitoring allotments) targets, roughly 30% (25-35) EE (Permit Renewal) targets, roughly 30% (25-30) MJ (Land Health Evaluations) targets. Outside of accomplishments, with roughly 10 unfunded positions there will be fewer RMS's to spend time with permittees and local/State agency folks to development and implement range improvement projects, coordinate annually grazing administration and coordinate efforts in maintaining and/or improve land health conditions. Some of these positions also have Invasive Species Management duties so we would expect a reduction in monitoring and treatments targets. This would affect the ability to comply with Secretarial order 3336. If the Utah 1020 program is reduced \$1.1 million in 2018, the cost could be larger than the proposed 18% reduction from 2017.

Long Term Issues: If left unresolved, Utah BLM would not be able to complete its core workload. Relationships with Permittees, landowners, Local and State agencies would suffer because of the lack of Rangeland Management Specialists in the field.

Audit Resolution/Breadth of Impact: The resolution is to at a minimum fund the Utah 1020 program at the 2017 AWP. If the Utah 1020 program is reduced by \$1.1 million dollars, the effects would be felt in the accomplishments of other programs such as Wildlife, T&E and Riparian.

Cost to Government: N/A

BLM Utah FY 2018 PTA Individual Appeal Description

Appeal # U-UT-2

Subactivities: L1050

Brief Description of Concern: FY2018 PTA for the Four Corners – Cerberus project is insufficient to sustain the labor, operations, curation, and tribal consultation efforts.

BLM-Utah will not be able to focus all efforts on Four Corners without additional FY2018 funding – Cerberus Project priorities, including long-term disposition decision efforts, transferring collections to non-federal repositories and other BLM states, consulting with stakeholders on the soon to be revised Native American Graves Protection and Repatriation Act (NAGPRA) collection inventory, developing interpretive exhibits based on the soon to be finalized Cerberus Collection Interpretive Plan.

The Utah State Office would allocate the additional funding to:

- Transfer collections materials to other jurisdictions, non-federal repositories, and other BLM states for curation.
- Cover the Museum Collection Manager's labor costs and travel.
- Implement the Cerberus Collections Interpretative Plan to establish consistent messaging related to the social and scientific consequences of looting archaeological resources and to promote a message of respect for Native Americans' cultural heritage.

Explanation: The Cerberus Collection project is a multi-year national priority that requires a substantial amount of funding to cover operation necessities and labor needs. This collection was confiscated by BLM law enforcement and is currently being held in a temporary repository in Salt Lake City, Utah and the Natural History Museum of Utah. In total, the collection consists of more than 46,000 American Indian artifacts, many of which are extremely important to tribes in the region.

Justification: Without the additional funding BLM-Utah will not be able to maintain the artifact disposition process nor manage contracts and assistance agreements. Specifically, BLM-Utah will not be able to legally move these artifacts to a Tribe, institution, or organization, leaving BLM-Utah responsible for these 46,000+ artifacts in perpetuity. An interpretive plan with consistent messaging to accompany the disposition of artifacts would not be able to be implemented in BLM offices or partner repositories without additional funding.

Context: L1630-Law Enforcement has paid for a tremendous amount of the care of these artifacts in previous years, along with L1050-Cultural Resources. However, at this time, no funding from L1630 is identified in the PTA.

Impact (use actual data to the extent possible): In the event the PTA allocation stands, BLM-Utah will not fund other directed projects, which will still leave a shortfall of funding. FY2018 goals will not be met, tribal relations may suffer, and the BLM will continue to temporarily care for 46,000+ artifacts without a disposition resolution. If the proposed resolution is accepted in part

BLM Utah FY 2018 PTA Individual Appeal Description

or in full, BLM-Utah will continue all Cerberus Collection efforts and work towards finalizing consultation, recommending artifact disposition, and finalizing NAGPRA notices.

Long Term Issues: Left unresolved, BLM will continue to have 46,000+ artifacts in temporary storage in perpetuity, which will transfer funding away from other directed projects.

Audit Resolution/Breadth of Impact: Continued care for this collection and the eventual disposition of artifacts, among other program goals, will address OIG findings and recommendations regarding the care and management of museum collections by the Department of the Interior.

Cost to Government: N/A

BLM Utah FY 2018 PTA Individual Appeal Description

Appeal #: U-UT-3

Subactivity: L1310/L1314/L1315/L914*

Brief Description of Concern: BLM Utah anticipated we would see an increase in the Oil & Gas programs based on the FY 2018 Presidents Budget and Secretarial Priorities.

Explanation: The requested \$ 3.3 million would ensure that BLM-Utah can meet projected labor costs, and move forward with implementing our staffing plan and establishing our State Office Energy Leasing Team & the Energy Knowledge Center)

L1310 – Requesting \$ 1.3 million - \$ 281,000 to cover on board labor shortfall; \$ 393,000 to stand up the Utah State Office Energy Leasing Team; \$ 672,000 to stand up the Energy Knowledge Center

L1314 - \$ 132,000 to cover on board labor shortfall and \$ 93,000 to fund two new PET's in Vernal

L1315 - \$ 114,000 to cover on board labor shortfall

L9141 - \$ 1.73 million to cover on board labor shortfall. The number of APD's expected are not likely to cover on board personnel. Funding for this shortage may be more appropriate in L1310.

Justification: Additional funding is needed to ensure compliance with law and policy.

Context: Additional funding is necessary to meet BLM's requirements under P.L 111-11, 3 CFR 6920, Federal Lands Policy and Management Act (FLPMA), and NEPA.

Impact: Reduction in leasing, processing APD's and inspections.

Long Term Issues: Reduced rentals and royalties and potential for environmental degradation.

Audit Resolution/Breadth of Impact: N/A

Cost to Government: TBD

BLM Utah FY 2018 PTA Individual Appeal Description

Appeal #: U-UT-4

Subactivity: L17110000

Brief Description of Concern: The basic 1711 funds available under the PTA are inadequate to cover BLM-Utah's permanent labor costs and critical operational costs for the Grand Staircase-Escalante National Monument (GSENM), Red Cliffs National Conservation Area (NCA), and Beaver Dam Wash NCA. The FY18 PTA would provide BLM-Utah with a \$4.5 million cost target in L1711 funding. BLM-Utah's core FY18 1711 labor costs are projected to be \$4.4 million, and BLM-Utah typically allocates an additional \$1.24 million of 1711 to support critical operational costs (\$600K for statewide administrative support, \$500K in project-level funding, and \$140K towards a Utah Centrally-Funded Initiative to support the GSENM's five visitor centers).

***Note:** While BLM-Utah now manages an additional 1.06 million acres of National Monuments than at PTA for FY17, the proposed FY18 budget calls for a \$1.65 million decrease in funds. To date, the newly established Bears Ears National Monument has not received any basic funds in 1711 through the budget process- funding has remained at the Monticello Field Office under prior funded subactivities. Traditionally, BLM has requested a re-programming of funds for newly established national monuments. Because of the ongoing Secretarial Review, BLM-Utah is only requesting additional funding for GSENM and the Red Cliffs and Beaver Dam Wash NCAs.*

Explanation: The requested \$1.14 million would ensure that BLM-Utah can meet projected labor costs, keep all 1711-related visitor centers open to the public, and provide the National Monument and NCAs with the support necessary for budget, procurement, GIS, and other key administrative functions.

Justification: Additional funding is needed to ensure compliance with law and policy, ensure proper care and management of objects and values, enhance recreational access, and to carry out the multiple-use mission of the BLM within National Monuments and National Conservation Areas.

Context: Additional funding is necessary to meet BLM's requirements under P.L 111-11, 3 CFR 6920, Federal Lands Policy and Management Act (FLPMA), and NEPA.

Impact: FY18 includes major milestones for two relevant planning efforts that ensure that the BLM meets its multiple-use mandate under FLPMA, as well as various requirements under P.L. 111-11 and 3 CFR 6920. These major efforts include the Livestock Grazing Monument Management Plan Amendment in GSENM and St. George Field Office's Travel Management Plan, which includes Red Cliffs and Beaver Dam Wash NCAs. The completion of these large-scale planning efforts are critical in creating defensible decision space to implement on-the-ground permits and authorizations, such as the processing of anticipated rights-of-way applications (i.e., Northern Transportation Corridor), planned vegetation treatments and grazing permits. Reduction in labor funding would decrease BLM-Utah's ability to remain on target for completion of these two high-profile plans, as well as authorizing lands and realty actions, vegetation treatments, and grazing permits.

BLM Utah FY 2018 PTA Individual Appeal Description

Long Term Issues: Failure to complete the planning efforts and NEPA associated with right-of-way, grazing permits, vegetation treatments, and other activities will likely create conflicts with key stakeholders in southern Utah communities. Failure to provide visitor services at GSENM's visitor centers will also likely lead to the perception that BLM-Utah is not supporting the tourism economy in local communities.

Audit Resolution/Breadth of Impact: N/A

Cost to Government: TBD

**BLM Utah FY 2018 PTA Feedback
Utah Energy Support Team Proposal**

The Utah Green River District (GRD) is proposing an innovative concept to ensure BLM Utah can meet important energy related work load now and in the future. We will use a Knowledge Center concept to address succession planning, mentoring, and training key specialists necessary for important energy/mineral related programs. The GRD will use seasoned program specialists to provide the technical expertise, mentoring and training opportunities to trainee positions (GS 7 9 11) and to other field offices across the state that sometimes have limited experience and expertise in energy/minerals programs. Knowledge Centers will play a key role in meeting our succession planning strategy by serving as the training office for certain disciplines and areas of expertise. Knowledge Centers when requested will provide technical advice and assistance to all field offices in Utah; the field offices will still maintain their capacity. The GRD is proposing to be a Knowledge Center for oil and gas, energy/mineral related NEPA, I&E, air management strategy implementation, mining engineering, and petroleum engineering.

We believe the Knowledge Center concept will enable BLM Utah to train and keep pace with the turnover of PETs and NRS inspectors; develop field savvy petroleum engineers, and grow a pool of NEPA specialists with mineral experience. There are significant threats to the program capacity due to turnover and pending retirements.

L1310 / L1320 Feedback

In reviewing the PTA directives for L1310/L1320 and the 2018 PTA Directorate Holdbacks for L1310, Utah is proposing the following additions to current staffing levels:

State	Office	Position Title	Grade	Funding	Additional Information
Utah	Green River District	Planning & Env. Coordinator	GS 0301 12	L1310	<p>This position is currently an unfunded term position on the TO. Additional funding is needed to recruit and hire as a permanent full-time position.</p> <p>Currently the Green River District, Vernal Field Office has 3 ongoing EISs and completes 100+ EAs annually.</p> <p>Utah BLM is proposing establishing a Knowledge Center for Oil & Gas/Realty NEPA for the state. This Knowledge Center would be located in the Green River District.</p>
Utah	Green River District, Vernal Field Office	Petroleum Engineer	GS 0881 7/9/11/12	L1310	<p>New position. Propose hiring 1 additional Petroleum Engineer as part of our succession planning strategy. Currently the Moab FO has 1 Petroleum Engineer eligible for</p>

Attachment 3-1

**BLM Utah FY 2018 PTA Feedback
Utah Energy Support Team Proposal**

					retirement and the Vernal FO has 2 Petroleum Engineers eligible to retire in 2018. Utah BLM is proposing establishing a Knowledge Center for Petroleum Engineers for the state. The Knowledge Center would be located in the Green River District.
Utah	Green River District, Vernal Field Office	Outdoor Recreation Planner	GS 0023 11	L1310	New position. This position would provide the ID team checklist input for O&G and realty actions as well as the lease sales. In addition this position would provide the LWC reviews as they impact O&G actions.
Utah	Green River District, Vernal Field Office	Wildlife Biologist	GS 0486 11	L1310	New position. This position would support APD, lease sale, and ROW processing plus Sundry Notice actions as needed. This position would complete the ID team checklist and monitoring of impacts to wildlife.
Utah	Green River District, Vernal Field Office	NRS (Reclamation)	GS 0401 7/9	L1310 / L1314	Hire 2 new GS-7/9 career seasonals for 5 to 6 work months each per fiscal year to complete field work during spring/summer months. Work would include conducting on-sites, reclamation and cleanup of orphaned, temporarily abandoned and shut in wells.
Utah	Green River District, Price Field Office	Planning & Env Coordinator	GS 0301 7/9/11	L1310 50% L1320 50%	New position. NEPA workload associated with leasing for the O&G and coal programs as well as the NEPA work associated with APDs and rights of ways warrants a second NEPA position for the Price FO.
Utah	Green River District, Price Field Office	NRS (Reclamation)	GS 0401 11	L1310 50% L1320 50%	New position. This position is needed to meet current permitting and leasing workload. Work would also include important on the ground presence conducting on-sites, reclamation and cleanup of orphaned, temporarily abandoned and shut in wells.

L1314 Feedback

Attachment 3-2

**BLM Utah FY 2018 PTA Feedback
Utah Energy Support Team Proposal**

In reviewing the PTA directives for L1314, Utah is proposing the following additions to current staffing levels for the oil and gas program:

State	Office	Position Title	Grade	Funding	Additional Information
Utah	Green River District, Vernal Field Office	Petroleum Engineering Technician	GS 0802 11	L1314	Propose hiring 2 additional PETs as part of our succession planning strategy. Currently the Vernal FO has 3 PETs eligible to retire.

Attachment 3-3

BLM Utah FY 2018 PTA Feedback Utah Energy Support Team Proposal

In 2006, the Utah State Office set up a statewide energy support team to assist the field offices with processing of expressions of interest, protest responses, appeals and litigation associated with quarterly oil & gas lease sales. The team was disbanded when several positions became vacant, funding tightened, and leasing reform was implemented in 2010. Subsequently, the number of acres offered for lease fell substantially. To reinvigorate the oil and gas leasing program, it is proposed the team be reconstituted.

The proposed team would be supervised by the fluid minerals branch chief and comprised of the following positions:

Team Lead/Leasing Coordinator	GS-12*
Natural Resource Specialist/Special Designations	GS-12
Archeologist (NHPA Sec. 106)	GS-12
Wildlife Biologist (ESA Sec. 7)	GS-12
NEPA Specialist	GS-12*
Petroleum Engineer	GS-12*
Land Law Examiner	GS-11*

*Positions currently on the funded positions list.

Positions in **bold** would be new and currently unfunded

The function of the team provides assistance to the field offices in the preparation of lease sales. Four of the positions are currently on the fluids branch table of organization and funded. However, additional funding would be necessary to fill the three additional positions. Each GS-12 position would require approximately \$111,000 funding for labor and \$50,000 for operations totaling a need of \$383,000 additional base funding. The UTSO currently has sufficient office space to accommodate the three additional positions.

