Ms. Gale Norton Secretary of the Interior Department of the Interior 1849 C Street, NW Washington, DC 20240

March 12, 2001

Dear Ms. Norton:

As you are no doubt aware, President George W. Bush's Budget "Blueprint" calls for a reduction in the Department of Interior's (DOI) core operating budget. The President has proposed an overall 4 % cut from FY '01 levels for the department. Given that this overall cut includes sizeable proposed increases in spending for park maintenance and land acquisition, DOI may have to seek substantial personnel reductions in order to meet this budget target.

Regardless of the wisdom of these budget proposals, the lack of specificity within the President's Blueprint concerning the allocation of reductions suggests that DOI may retain some flexibility in deciding how to meet those targets. To that end, the organization which I represent, Public Employees for Environmental Responsibility (PEER) would like to draw your attention to three facts concerning DOI staffing trends during the Clinton Administration:

1. As measured by the number of full-time federal employees, DOI staffing has fallen more than 17% from 1992, through 1999 (the last year for which figures are publicly available); falling from 86,050 full-time equivalents ("FTEs") to 72,830.

2. The only agency within DOI, other than the Office of the Solicitor, which actually increased staffing during this period was the Office of the Secretary of Interior. While overall, DOI lost more than 13,200 FTE's, the Office of Secretary grew nearly 30 %, from 1,114 FTEs in 1992 to 1,444 in 1999.

3. At the same time that the number of staff within the Secretary's Office rose, the average salary of those staff also increased more than \$10,000 during this period, from an average salary of \$49,662 in 1992 to an average of \$59,881 in 1999. [see attached tables]

The purpose of this letter is to suggest that any personnel cuts begin with the higher paid positions within Office of the Secretary in Washington, D.C. rather than with field biologists or other field staff who are working on the ground directly with the resources in the care of the constituent agencies of DOI.

As overall DOI staffing levels have fallen, by virtually every measure, the workload on the DOI agencies has steadily grown. The total acreage of DOI lands, number of parks, refuges and other units, visitor-ship to those units, number of permits, concessions and other transactions affecting those units have all risen, in some cases, dramatically. Meanwhile, the number of land managers, scientists, law enforcement officers and other "line" staff tasked with protecting these natural resources in the face of spiraling demands is steadily shrinking.

At the same moment that staff cuts at DOI are being formulated, the President's energy strategy appears to be emphasizing greater energy exploration and production from public lands. Significant staff cuts in the federal land management and natural resource agencies may jeopardize attempts to quickly and responsibly evaluate and administer heightened demand for commercial access to these same public lands.

Contrary to its "re-invention" rhetoric of reducing layers of management, during their tenure the Clinton Administration cut agencies from the bottom, not the top, thus aggravating bureaucratic growth at the expense of field-level presence. Reductions-inforce (RIFs) during the mid-90's at the Office of Surface Mining (OSM) and within the Geologic Division of the US Geological Survey (USGS) are cases in point:

\* At OSM, hundreds of inspectors, engineers and other enforcement staff were "RIF"ed and today OSM is a shadow of its former self --little more than half its staffing levels in 1992. Yet the average salary within OSM has grown to now exceed \$61,000--a rate of salary growth proportional to its staff cut indicating that the middle and upper managers were the survivors of the RIF.

\* At USGS, more than a thousand scientists were removed from the payroll but virtually no managers or supervisors were removed. The Geologic Division is the earth science center stressing basic over applied research. Before the RIF, USGS deserved the moniker as the "world's premier science agency." The RIF removed many of the best scientists, effectively "lobotomizing" the world's premier science agency.

We implore you not to repeat the mistakes of the Clinton Administration and to keep the field staff on our federal lands intact with sufficient material support to do their jobs. To the extent reductions are considered, begin that examination in your own office.

Sincerely,

Jeffrey Ruch Executive Director