

# Interior Department Reorganizes into 12 “Unified Regions” – To What Effect On The Ground?

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Department of the Interior (“DOI”) Secretary Ryan Zinke announced on August 29, 2018, DOI’s “final” version of its new reorganization plan, which creates 12 new “[Unified Regions](#)” primarily intended to coordinate and expedite decision making related to the land, water, resource management, and permitting functions of the various DOI bureaus, including the Bureau of Land Management (“BLM”), U.S. Fish and Wildlife Service (“FWS”), National Park Service (“NPS”), U.S. Geological Survey (“USGS”), Bureau of Reclamation (“BOR”), and Office of Surface Mining Reclamation and Enforcement (“OSMRE”). The Bureau of Indian Affairs will not be affected.

## The Plan

According to the reorganization plan, DOI will assign one representative from each bureau to participate in regional leadership teams, which, in turn, will work with a regional facilitator to identify priorities for each Unified Region across six management areas: collaborative conservation, recreation, permitting, acquisition, human resource management, and information technology management. The regional leadership teams and facilitators will also develop an options paper for identifying Interior Regional Directors (“IRDs”), who will help coordinate the activities of the various bureaus within each region and to assist in resolving inter-bureau conflicts.

The intent is that the addition of the 12 Unified Regions, the boundaries of which are generally based on eco-regional watershed delineations made in the 2000s, will improve collaboration and coordination across the various interior bureaus, which have disparate – and sometimes conflicting – mandates. The reorganization plan is also intended to reduce administrative costs and empower field personnel to make management decisions that are more responsive to local and regional resource management concerns than decisions made in Washington, D.C. Improving the processing of federal permits has been a recurring theme of this administration, including the One Federal Decision framework.

## Effect on Bureau Operations

The effect of the plan on bureau operations will largely depend on the bureau and plan

implementation. For example, to comport with the new 12-region map, FWS, which currently has 8 regions, will need to add four new functional regions that each will require staffing and the appointment of new regional administrators with authority over permit decisions and other authorizations. In contrast, the Unified Regions will not alter BLM's current state and field office-based management structure, despite that many of the Unified Regions will subsume multiple BLM state offices, and some BLM state offices will straddle multiple Unified Regions.

The immediate impact of the 12 Unified Regions on DOI's ability to manage to local and regional concerns is therefore unclear. Though the addition of new operational regions at FWS (and possibly NPS and OSMRE, which currently have 6 and 5 regions, respectively) will arguably augment the ability to respond to local and regional concerns, DOI has emphasized that "the new regional boundaries should have very little impact on field operations." Additionally, under the plan, the bureau directors in Washington still retain control of interpreting and applying policy directives in the new Unified Regions. Moreover, DOI has no plan to relocate or co-locate personnel to regional or local offices, and although the administration has requested funding to support the migration of some BLM and FWS headquarters resources westward, headquarters relocation and personnel migration are not a part of the current plan. BLM's ability to maintain its relationship with local communities should be unaffected because its current state and field office-based management system will remain intact.

## **Impact on Permitting Decisions**

Staffing of the new regions will be critical. While the addition of new regions for bureaus such as FWS may affect the status and ultimate disposition of permits pending there, DOI anticipates – at least for the next year – that current regional managers will take on management responsibilities for the new regions. But within the next year, affected industries may see increased regional coordination among DOI bureaus that have joint authority to approve their proposed projects and permit applications, which may result in expedited review and approval.

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