

Bureau of Land Managements **Stance on the Condition of Public Lands**

The following is an excerpt from the BLM's Fiscal Year 2005 Status Report, page 49.

The BLM completed all corrective actions in fiscal year 2005 to address the following material weaknesses and FFMIA noncompliance issues:

1. One material weakness: Accounting for Mineral Leases.
2. Four FFMIA noncompliance issues: (a) Reporting of Deferred Maintenance Amounts for Stewardship Land, (b) Accounting for Mineral Leases, (c) Reporting the Number of Museum Items Held in Non-Federal Facilities, and **(d) Reporting the Condition of Stewardship Land.**
3. One carryover noncompliance issue: Security and Internal Control over Information Technology Systems.

In this report, this was BLM's response to
d) Reporting the Condition of Stewardship Land, page 53

“The condition of all of the BLM-administered public lands is categorized as “acceptable.” That is, the public lands are in adequate condition to sustain the multiple uses and use levels authorized during the current reporting period. **This condition is evidenced by the vast resource production and revenues generated from the public lands.** This information is available to the reader in the BLM publication *Public Land Statistics*, Part 3, “Commercial Uses and Revenues Generated,” which is available on the Internet at <http://www.blm.gov/nhp/browse.htm>”

“They fail to address what condition they are leaving it in for tomorrow”

However, attached is BLM's “official response” to the auditors who cited them for failing to report the Condition of Stewardship Land taken from the January 31, 2006 Memo to Kathleen Clark from Anne Richards, Assistant Inspector General for Audits.

To: Kathleen Clark

From: Anne L. Richards

Assistant Inspector General for Audits

January 31, 2006 Memo

Subject: Independent Auditors' Report on the Bureau of Land Management's Financial Statements for Fiscal Years 2005 and 2004 (Report No. X-IN-BLM-0012-2005)

The finding fails to take into consideration crucial language found in FASAB Standards 8 and 29 themselves. According to SFFAS 8, Paragraph 71, "Land' is defined as the solid part of the surface of the earth. *Excluded* [emphasis added] from the definition are the natural resources (that, is depletable resources, such as mineral deposits and petroleum; renewable resources, such as timber; and the outer-continenta shelf resources) related to land." The same identical definition of land is found in SFFAS 29, Paragraph 34. Footnote 17 to the latter states, "The Board presently has an active project to address standards for natural resources, for which the Board is considering developing individual standards for each type of natural resource separately. To begin the project, the Board will be addressing oil and gas resources. The framework for the oil and gas resource phase of the project will be used as a model when addressing the other types or logical sets of natural resources (e.g., timber, grazing land, solid leasable minerals) in subsequent phases of the project." FASAB in a very straightforward manner is clearly distinguishing between land as essentially rock and sediment from any type of natural resource.

The Department of the Interior has taken the position that it "will not perform formal condition assessments of stewardship land. Likewise, the Department will not perform parcel-by-parcel reviews of stewardship land, which would not be feasible or cost-effective."

The BLM has stewardship responsibilities over the natural resources on its lands and provides condition assessments on selected resources in the BLM's *Public Land Statistics* (PLS) and other reporting. For example, approximately 159 million acres of the BLM's

261 million acres is found within grazing allotments, and reporting on the vegetation on these lands is found in PLS Table 2-1, "Percent of Rangeland Acreage by Ecological Status by State." However, SFFAS 29 clearly states that FASAB will be addressing grazing land as a resource in future guidance, and there is currently no reporting requirement for this resource, particularly given FASAB's current definition of "land."

In light of BLM's multiple-use mission as defined by the Federal Land Policy and Management Act (FLPMA) of 1976, we believe that defining "acceptable" condition for "rock and sediment" in terms of "when it is adequate for the uses authorized during the period of the report" and the "needs intervention" condition category in terms of "not supporting any of the uses authorized during the period of the report" is entirely reasonable, useful, valid, and fully in accord with SFFAS 8 and 29. Using these definitions, the BLM can state that the condition of the Public Lands is "acceptable."

