

# Exhibit 1



704C East 13th Street, Suite 568  
Whitefish, MT 59937

Clarice Julka  
FOIA Officer  
Office of the Secretary  
E-Mail: [osfoia@ios.doi.gov](mailto:osfoia@ios.doi.gov)

August 1, 2019

Dear Records Request Officer:

### **Background Information**

On July 16, 2019, the Department of the Interior sent a letter to Senator Lisa Murkowski, Chair of the Appropriations Subcommittee on Interior and Environment, announcing that the Bureau of Land Management would be moving its headquarters to Grand Junction.<sup>1</sup> Since first proposed by Senator Gardner in 2016,<sup>2</sup> DOI and BLM have neglected to many concerns raised by BLM employees and questions from critics about this proposed move, and many of those same questions remain unanswered as of today.<sup>3</sup>

### **FOIA Request**

Pursuant to the Freedom of Information Act, I request a copy of any final document sent to a Senate committee and/or to the General Services Administration listing all Bureau of Land Management positions and/or titles that the Department of Interior is planning to relocate. To be clear, I only seek a copy of one document, and request only a copy of the whatever final document was produced closest to July 23, 2019, showing the details of the following transfers of positions and/or titles:

- Twenty-seven (27) positions relocating to Grand Junction, including the director, deputy director and their attendant staff.
- Two hundred twenty-two employees moving to BLM state offices.
- Eighty-five (85) employees relocating to Colorado; 54 positions will be divided between the state office and the National Operations Center in Lakewood and 4 additional positions go to the state office.
- Seventy-four (74) positions reallocated to state offices and report to state directors.

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<sup>1</sup> *Denver Post*, [07/16/19](#)

<sup>2</sup> Sen. Gardner press release, [05/01/19](#)

<sup>3</sup> *CPR News*, [07/16/19](#)

- Sixty-one (61) employees remaining in Washington D.C. at the headquarters of the Department of Interior.<sup>4</sup>

### **Fee Waiver Request**

In accordance with 5 U.S.C. § 552(a)(4)(A)(iii), Western Values Project requests a waiver of fees associated with processing this request for records. The subject of this request concerns the operations of the federal government, and the disclosures will likely contribute to a better understanding of relevant government procedures by the public in a significant way. Moreover, the request is primarily and fundamentally for non-commercial purposes. 5 U.S.C. § 552(a)(4)(A)(iii).<sup>5</sup>

Western Values Project requests a waiver of fees because disclosure of the requested information is “in the public interest because it is likely to contribute significantly to public understanding” of government operations and is not “primarily in the commercial interest of the requester.”<sup>6</sup> The disclosure of the information sought under this request will document and reveal the operations of the federal government, including how public funds are spent and how officials conduct the public’s business. The public has a significant interest in ensuring that its statutory right to access public records is not being undercut by political concerns.

This request is primarily and fundamentally for non-commercial purposes. As a project of a 501(c)(3) organization, Western Values Project does not have a commercial purpose and the release of the information requested is not in Western Values Project’s financial interest. Western Values Project’s mission is to give a voice to Western values in the national conversation about resource development and public lands conservation, a space too often dominated by industry lobbyists and their government allies. Western Values Project will use the information gathered, and its analysis of it, to educate the public through reports, press releases, or other media. Western Values Project will also make materials it gathers available on our public website <http://www.westernvaluesproject.org/>.

Accordingly, Western Values Project qualifies for a fee waiver.

### **Conclusion**

If possible, I would prefer to receive this information electronically via e-mail at [csaeger@westernvaluesproject.org](mailto:csaeger@westernvaluesproject.org).

If you have questions or need additional information, please feel free to contact Brad Hennessy, my associate who will be handling all follow-up on this request. Brad can be reached at [brad@westernvaluesproject.org](mailto:brad@westernvaluesproject.org) or at (406) 924-9491.

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<sup>4</sup> Ibid

<sup>5</sup> See, e.g., *McClellan Ecological Seepage Situation v. Carlucci*, 835 F.2d 1282, 1285 (9th Cir. 1987).

<sup>6</sup> 5 U.S.C. § 552(a)(4)(A)(iii)

If my request is denied in whole or part, I ask that you justify all deletions by reference to specific exemptions of the act.

Thank you for your assistance.

Sincerely,

Chris Saeger  
Executive Director  
Western Values Project