As a deciduous conifer, the western larch has a contrary nature.

Larch Company Occasional Paper #6

Establishing a System of and a Service for U.S. Deserts and Grasslands

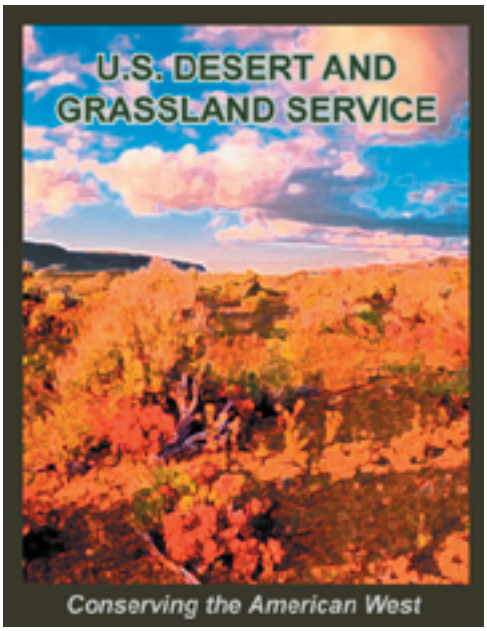
by Andy Kerr and Mark Salvo

ABSTRACT

The Bureau of Land Management should be subsumed by a congressionally authorized U.S. Desert and Grassland Service analogous to the U.S. Forest Service. The new agency would manage most public lands currently managed by BLM in a new National Desert and Grassland System, analogous to the National Forest System. The agency would have the mission of managing these public lands for biological diversity conservation, watershed protection, carbon sequestration and compatible recreation. As appropriate, remaining BLM lands would be transferred to the National Park System, National Forest System and National Wildlife Refuge System. Upgrading the BLM from a "bureau" to a "service" would improve public land and resource management. Integrating BLM lands into a new land conservation system would also increase public awareness, acceptance and support for these federal public lands.

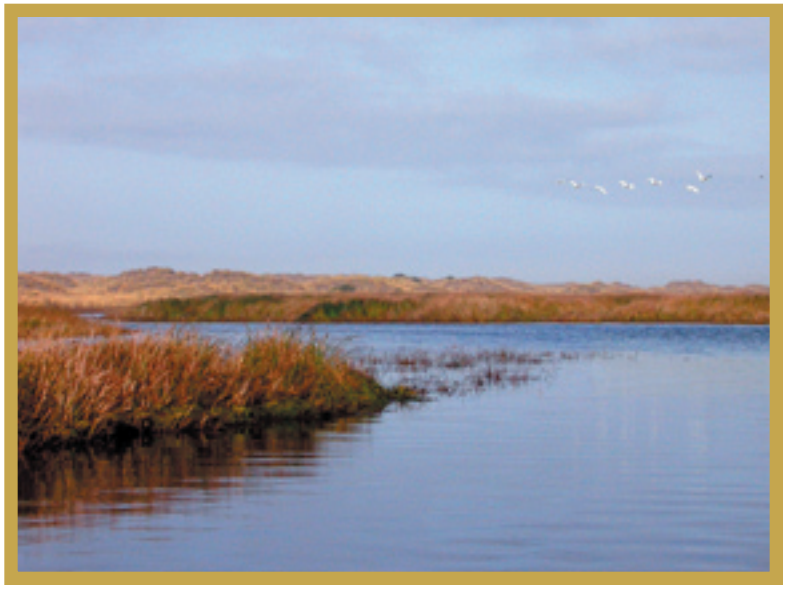
1952–1963

1964–present



Future

The Bureau of Land Management (BLM) does not get much respect. Unfortunately, the agency's dismal reputation is not without cause. The agency has misplaced priorities, which results in mismanagement of public resources. Critics have justifiably nicknamed BLM the "Bureau of Large Mistakes," "Bureau of Livestock and Mining," and "Bureau of Lumbering and Mining."



Francis Eatherington

The BLM manages some coastal and wetland areas that should be managed by the Fish and Wildlife Service as part of the National Wildlife Refuge System, including the New River on the Oregon coast.

Born in 1946 out of a merger of the federal General Land Office (est. 1812) and the U.S. Grazing Service (est. 1934), the present day BLM reflects its parentage by continuing to serve as partner or handmaiden to exploiter interests. For most of its history the BLM has been a mere custodian of federal public lands left over from the great historic giveaways to homesteaders, railroads, loggers, and miners, and not otherwise reserved as national forests, wildlife refuges, parks and military reservations. However, these remaining public lands are valuable for biological diversity conservation, watershed protection, carbon sequestration and compatible recreation and should no longer be left to the domain of extractive industries.

BLM Today

The BLM has jurisdiction over 258 million surface acres of federal public land in 33 states, which is approximately 11 percent of the total surface acreage in the United States. The majority of BLM holdings are in the 11 western states and Alaska.[1] These lands, if they are even depicted on maps, are generally known as "public lands" or "BLM lands" (see Table 1).

Jim Davis

The BLM should have designated millions of acres of qualifying roadless and undeveloped BLM lands as Wilderness Study Areas, such as the Dry Creek Canyon in the Oregon Desert portion of the Sagebrush Sea.

The BLM also manages nearly 700 million acres of federal subsurface mineral estate.[2] Most of this acreage is located in the National Forest System, National Wildlife Refuge System and National Park System. The BLM is responsible for the subsurface minerals, while the surface lands (and "common" minerals such as sand and gravel) are managed by the Forest Service, Fish and Wildlife Service and National Park Service, respectively. The BLM also manages significant subsurface minerals where the land surface is not federally owned. Finally, BLM also manages the mineral estate of lands held in trust for Indian Tribes (see Map 1 and Map 2).

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1 BLM. 2006. Public Lands Statistics. Bureau of Land Management. Washington, DC: 15, Table 1-3.
2 *Public Land Statistics* (2006): 1.

Table 1: Surface and Mineral Estate Administered by the Bureau of Land Management[3]

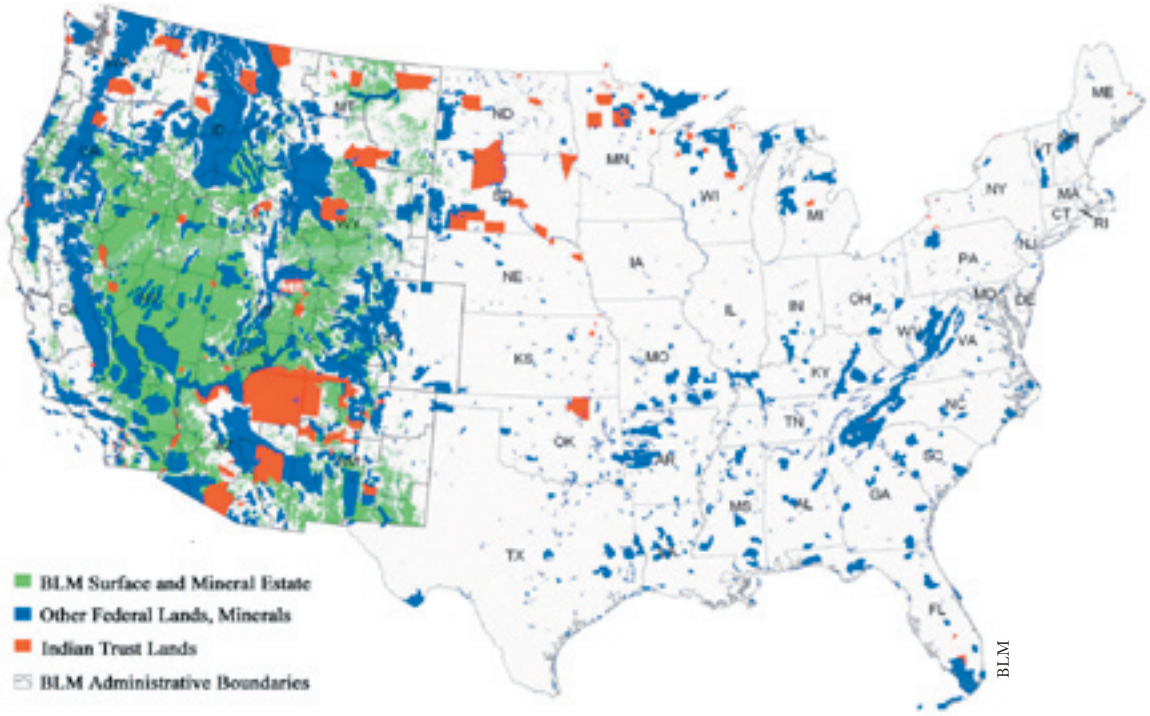
State	Total Surface Lands	Federal Minerals /a/	Federal Surface Lands /b/	Spit-Estate Federal Lands /c/	BLM Public Lands /d/	Indian Trust Minerals /e/	Notes
Alaska	365.48	237.0	237.0	0.0	83.5	1.2	
Arizona	72.69	35.8	33.0	3.0	12.2	20.7	/f/
California	100.21	47.5	45.0	2.5	15.2	0.6	
Colorado	66.49	29.0	24.1	5.2	8.3	0.8	/g/
Eastern States	/h/	40.0	40.0	0.3	0.1	2.3	
Hawaii	4.11	0.6	0.6	0.0	0.0	0.0	
Idaho	52.93	36.5	33.1	3.4	11.6	0.6	
Kansas	52.51	0.8	0.7	0.1	0.0	0.0	
Montana	93.27	37.8	26.1	11.7	8.0	5.5	
Nebraska	49.03	0.7	0.7	0.0	0.1	0.1	
New Mexico	77.77	36.0	26.5	9.5	13.3	8.4	/g/
North Dakota	44.45	5.6	1.1	4.5	0.1	0.9	
Oklahoma	44.09	2.3	1.7	0.5	0.1	1.1	
Oregon	61.60	33.9	32.4	1.5	16.1	0.8	
South Dakota	48.88	3.7	2.1	1.6	0.2	5.0	
Texas	168.22	4.5	4.5	0.0	0.1	0.0	
Utah	52.70	35.2	34.0	1.2	22.8	2.3	/f/
Washington	42.69	12.5	12.2	0.3	0.4	2.6	
Wyoming	62.34	41.6	30.0	11.6	18.3	1.9	
Total	*1529.72*	*699.7*	*643.2*	*57.2*	*258.2*	*56.0*	

This table and the accompanying maps represent 2 years of effort involved in researching, collecting, analyzing, and verifying data from numerous sources, and then coordinating and consulting with BLM State staff and other agencies. It presents a "snapshot" of data as of 1999. Because of the scope and complexity involved in creating and updating this table, and the fact that it is intended to present an approximation of the surface and mineral acreages managed by the BLM, yearly updates are not planned. Estimated acreages were based on various sources of published and unpublished data. The rationale used to develop these data is presented in "Public Lands, On-Shore Federal and Indian Minerals in Lands of the U.S.," prepared by Sie Ling Chiang of BLM's Washington Office in 2000. The first column, Land Total, is taken from Table 1-3, Public Land Statistics, 1999, while the fifth column, BLM Public Lands, comes from Table 1-4, Public Land Statistics, 2006.

/a/ The term Federal Minerals refers to on-shore Federal minerals that are part of the BLM's responsibilities. The on-shore Federal mineral acreage approximates the sum of Federal Surface Lands acres and Split-Estate Federal Minerals acres shown in the next two columns. As of 1999, the total was approximately 700 million acres.
/b/ Federal Surface Lands include both the public domain and acquired lands of all Federal agencies. With the exception of an estimated 4 million acres of the acquired lands, Federal mineral rights exist in all Federal lands.
/c/ The term Split-Estate Federal Minerals refers to Federal mineral rights under private surface lands. These are patented lands with minerals reserved to the U.S. Reservations may be for single, multiple, or all minerals. The 58 million acres is the mid-point of estimates ranging from 55 to 60 million acres (provided by the BLM's Colorado State Office).
/d/ On these public lands, the BLM manages both surface resources and subsurface minerals. The surface acreage is part of the Federal Surface Lands shown in the third column. The subsurface mineral acreage is part of the Federal Mineral estate included in the second column. As of 2006, the BLM's public lands comprise 258 million surface acres.
/e/ As part of its trust management responsibility, the BLM provides technical supervision of mineral development on 56 million acres of American Indian trust lands except for Osage lands. All minerals in Indian trust lands are "leasable." Acreage information was obtained in 1999 from the Real Estate Services staff of the Bureau of Indian Affairs.
/f/ Navajo and Hopi oil and gas in Arizona and Utah are managed by New Mexico BLM.
/g/ Ute Mountain Ute oil and gas in New Mexico are managed by Colorado BLM.
/h/ The BLM's Eastern States Office is responsible for managing federal minerals in the 31 states east of or bordering on the Mississippi River.

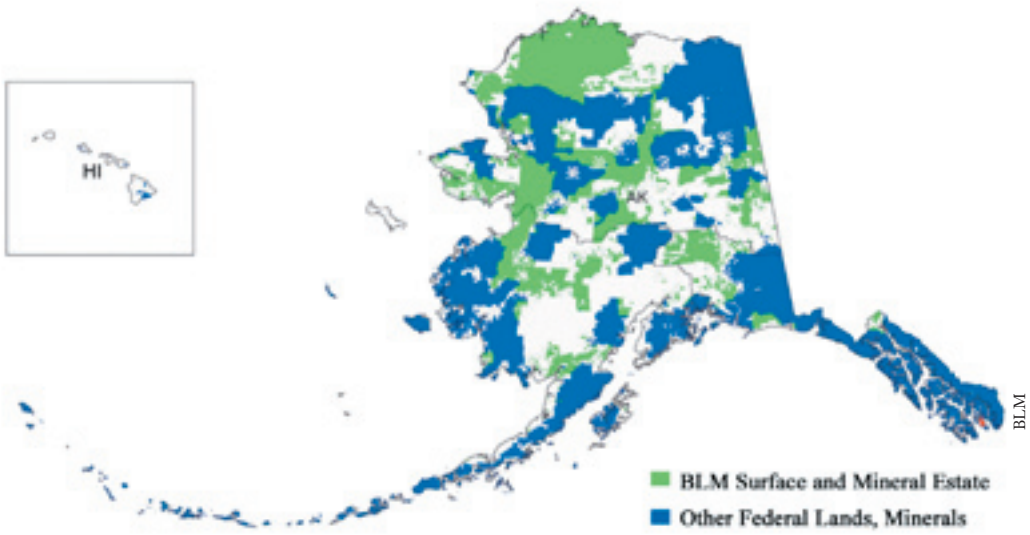
[3] Figures are in millions of acres. Table 1 and notes are copied from *Public Land Statistics* (2006): 15, Table 1-3 ("Mineral and Surface Acres Administered by the Bureau of Land Management FY 2006"). Any inconsistencies, incongruities, ambiguities, and punctuational and grammatical errors in the footnotes are original to the BLM source document.

Map 1: Public Lands, On-shore Federal and Indian Minerals in Lands in the Lower 48 States[4]



The land surface shown in blue are primarily managed by the Forest Service, Fish and Wildlife Service or National Park Service as part of the National Forest System, National Wildlife Refuge System or National Park System. Not depicted are 58 million acres of split estate non-federal surface/federal subsurface ownership (a total area approximately as large as the red areas). Indian trust lands are not public lands.

Map 2: Public Lands, On-Shore Federal in Alaska and Hawai'i[5]



The land surface shown in blue are primarily managed by the Forest Service, Fish and Wildlife Service or National Park Service as part of the National Forest System, National Wildlife Refuge System or National Park System.

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4 *Public Land Statistics* (2006): 9-10.
5 *Public Land Statistics* (2006): 13.

Second-Class Agency

The BLM's stewardship failings can be attributed to a lack of funding, vision, purpose and leadership. The BLM manages more land with less money than any other federal land management agency. This makes it difficult for the agency to inventory and monitor, and conserve and restore public lands. Money is not everything, but it is something. Vision, purpose and leadership have been impossible to develop and sustain, especially under episodic administrations that appoint Interior Department officials that are generally hostile to the public interest, and even to the concept of public lands.

David Calahan

The BLM permits ORV abuse on public lands (BLM, Medford District).

The BLM's stewardship record has slowly improved since the Federal Land Policy and Management Act (FLPMA) was enacted in 1976—albeit in fits and starts, and with much backsliding. More progress was made during the Carter and Clinton Administrations than the Reagan and Bush I administrations. BLM has backslid dramatically during the Bush II Administration to the bad old days of serving as a handmaiden to timber and grazing interests, energy developers and off-road vehicle users.

Second Class Lands

FLPMA ended the policy of wholesale giveaways of public lands. The act restricts—but did not eliminate—BLM's ability to dispose of public lands and generally requires the agency to manage them in the best interests of the American people.

Unfortunately, even following enactment of FLPMA, BLM continues to manage its lands primarily for resource extraction. Perhaps due to the aridity of most BLM lands, some find them less interesting and/or aesthetically pleasing and thus less worthy of conservation and protection.[6] Congress has traditionally directed and allowed for greater levels of exploitation on BLM holdings than on other public lands.[7]

Peter Aengst/The Wilderness Society

The BLM considers oil and gas extraction as one of many "multiple uses" suitable for public lands. Research indicates that sage-grouse, mule deer, elk and pronghorn avoid areas of oil and gas development.

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[6] Professor Holly Doremus described the challenges of "saving the ordinary," as exemplified by BLM lands. H. Doremus. 2002. Biodiversity and the Challenge of Saving the Ordinary. *Idaho Law Review* 38: 325-354. The public must be educated about unfamiliar landscapes before it will demand their protection. M. Salvo and A. Kerr. "Branding the Tree-free Landscapes of the American West." Unpublished paper. Sagebrush Sea Campaign. Chandler, AZ. (available at www.sagebrushsea.org/land_branding_sb_sea.htm).

[7] Compare conservation mandates for the Park Service (National Park Service Organic Act of 1916, 16 U.S.C. § 1), the Fish and Wildlife Service (National Wildlife Refuge Improvement Act of 1996, 16 U.S.C. § 668dd), the Forest Service (National Forest Management Act of 1976, 16 U.S.C. § 1600) (NFMA) and BLM (FLPMA; 43 U.S.C. § 1701(a)). Not surprisingly, the first two statutes prioritize conservation on national parks and refuges; they do not require "multiple use" like NFMA and FLPMA. However, even NFMA provides better protection for national forests than FLPMA affords BLM lands. Also, FLPMA still allows the Secretary of Interior to dispose of public lands without Congressional approval (43 U.S.C. § 1713), whereas only Congress can determine when lands will be sold from the national forest, park and refuge systems.

Congress has also never afforded BLM lands the same status as other federal public lands. The Forest Service manages the "National Forest System," the Park Service administers the "National Park System," and the Fish and Wildlife Service oversees the "National Wildlife Refuge System."[8] All of these *systems* enjoy broad public support and are commonly depicted on road maps and atlases. BLM lands are unnoticed because they are not part of a formal protective system. Even today, one can drive across the American West and be viewing millions of acres of BLM lands and not know it. Fortunately, the agency has begun to put up some signs.

www.photos.com

Domestic livestock grazing on BLM land degrades water quality, erodes soil, spreads weeds, and displaces native wildlife.

Box 1: Grasslands and Deserts of the United States

Grasslands Grasslands are (were) primarily found in the Great Plains east of the Rocky Mountains. From east to west (from mesic to more xeric longitudes), grasslands were comprised of tallgrass prairie (western Minnesota, Iowa, northwestern Missouri, and the eastern fringes of North and South Dakota, Nebraska, Kansas, and Oklahoma); mixed prairie (North and South Dakota, Nebraska, Kansas, Oklahoma, and central Texas); and shortgrass prairie (central and eastern Montana, the western parts of Nebraska, Kansas, Oklahoma and Texas, and the eastern quarters of Wyoming, Colorado and New Mexico). Prior to American settlement, these grasslands were the "buffalo commons," home to millions of bison and prairie dogs, and nourished by wide, flat rivers like the Little Missouri, Arkansas, and the Platte. Only remnants of untrammeled Great Plains grasslands remain. Other grassland systems occur in the Central Valley and western foothills of the Coast Range in California, and the Palouse in eastern Washington, northeastern Oregon and western Idaho.

The Sagebrush Sea Much of the Intermountain West is covered by sagebrush steppe, popularly known as the "Sagebrush Sea." The heart of the Sagebrush Sea is shaped by the Columbia River and Snake River basins, the Great Basin, and the Wyoming and Colorado plateaus. Various references have described overlapping regions of the Sagebrush Sea as "Great Basin" (type) desert, "intermountain grasslands," "intermountain sagebrush steppe," or "Great Basin-Colorado plateau sagebrush semi-desert." The Sagebrush Sea is also known as "high desert" or "cold" desert, as opposed to the "hot" (true) deserts of the American Southwest. Sage-grouse and pronghorn are charismatic megafauna in sagebrush steppe.

Deserts There are three major types of true (hot) deserts in the Southwest. The Mojave Desert covers much of southern California, southern Nevada, and the northwestern corner of Arizona. It is defined by spiny joshua trees and is home to the desert tortoise. Symbolized by the stately saguaro cactus, the Sonoran Desert borders the Mojave Desert at the west and extends southward through Arizona and the southern tip of California into mainland Mexico and the Baja Peninsula. The Chihuahuan Desert is the largest desert in North America, but only the northern tip extends into the United States in New Mexico and Texas. It is characterized by the ubiquitous creosote bush.

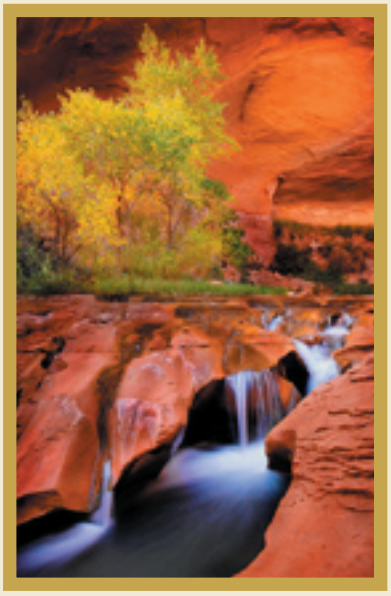
[8] Doremus (2002): 336 ("the national forests, national parks, and national wildlife refuges were all deliberately set aside for public purposes, prominently including conservation. Most of these conservation lands have special, iconic status in public perception. As a society, we readily agree that parks and wildlife refuges should be dedicated to conservation, and we are coming to that view with our national forests" *(citation omitted)*.).

Box 2: The National Landscape Conservation System

Some BLM lands are now part of the National Landscape Conservation System (NLCS) created by the Clinton administration in 2000 (see Map 3). The NLCS draws together National Conservation Areas;[9] BLM Wilderness and Wilderness Study Areas; Wild and Scenic Rivers, National Monuments, and National Historic Trails on BLM lands; the Headwaters Forests; the Steens Mountain Cooperative Management and Protection Area; and the California Desert Conservation Area into a formal—if indeterminate—"conservation system." A BLM associate director manages a small office to administer the NLCS. Although the agency has stated it will promulgate no new legal protections or restrictions for NLCS units, the system could be fertile ground to develop progressive BLM leadership and strengthen the conservation ethic within the agency.

Lesley Adams

The Steens Mountain Cooperative Management and Protection Area is part of the formal, if indeterminate, National Landscape Conservation System.



Michael Anderson

Grand Staircase Escalante National Monument.

Legislation has been introduced in Congress to formally authorize the NLCS.[10] However, even if that legislation is enacted, the NLCS will remain a stop-gap conservation system. Certainly establishing the NLCS in statute would be superior to its current administrative structure and policy, which are vulnerable to modification or abolition by the current or future Administrations. But the authorizing legislation (as introduced) would not afford NLCS units any additional protection above what they already receive from existing federal statutes and regulation.[11] Most NLCS units are part of other congressionally established conservation "systems" (National Wilderness Preservation System, National Wild & Scenic Rivers System, National Trails System), which Congress has previously established and for which it has established standards for management. The remaining units were either Congressionally designated or presidentially proclaimed pursuant to Congressional delegation of authority (i.e., national monuments established under the Antiquities Act).

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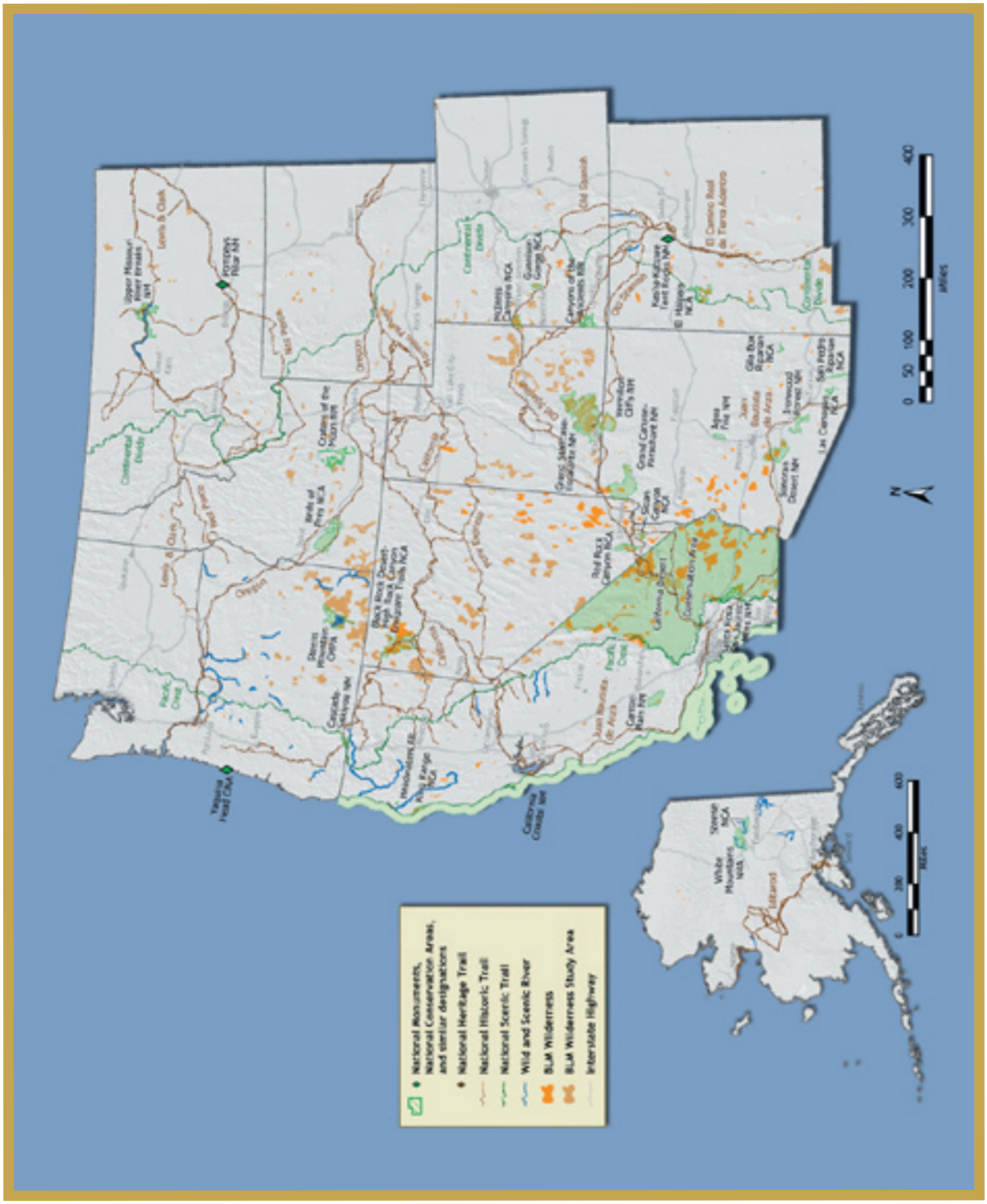
9 *See* A. Kerr and M. Salvo. 2001. Bureau of Land Management National Conservation Areas: Legitimate Conservation or Satan's Spawn? *UCLA Journal of Environmental Law and Policy* 20 (1) 1: 67-77.

10 "The National Landscape Conservation System Act," S. 1139 (110th Cong.) (Apr. 18, 2007); H.R. 2016 (110th Cong.) (Apr. 24, 2007).

11 The fact that the Bush II Administration supports the NLCS authorizing legislation is additional evidence that the resulting statute would do nothing more than prevent future Administrations from dismantling the system.

Map 3: National Landscape Conservation System



The Wilderness Society

Most BLM land is outside of the National Landscape Conservation System.

Establishing the National Desert and Grassland System

It is time for the BLM to have its own land conservation system: a National Desert and Grassland System (NDGS). Congress should place appropriate BLM lands into a system of national deserts and grasslands similar to national forests. Congress has already designated some National Grasslands, which are currently managed by the Forest Service as part of the National Forest System. These should be transferred to the new NDGS. Congress should enact a new legislative charter for NDGS lands so they have a conservation mandate comparable to other federal public lands.

Washington Department of Fish and Wildlife

The pygmy rabbit (Brachylagus idahoensis) *is a sagebrush obligate species that is imperiled throughout its range. Most sagebrush steppe is managed by the BLM.*

Gary Kramer/U.S. Fish and Wildlife Service

While more than 50% of remaining sagebrush habitat for the imperiled greater sage-grouse (Centrocercus urophasianus) *is found on BLM lands, the agency does little to conserve the species and much to drive it closer to extinction.*

Establishing the U.S. Desert and Grassland Service

In addition to upgrading the status of BLM lands, it is also time for Congress to upgrade the status of the managing agency by giving it a new vision, mission and name. BLM has a second rate name among the federal land management agencies. The others employ personnel in *service* to the nation, while the Bureau of Land Management has *bureau*crats. Congress should create a new agency: the U.S. Desert and Grassland Service (USDGS). Both morale and professional standards within the agency would improve and result in better land stewardship.

The new USDGS should be structured like the Forest Service with a National Desert and Grassland System branch dedicated to managing these unique landscapes, and a second scientific research branch dedicated to understanding the function and recovery of desert and grassland ecosystems everywhere. It also needs a third branch similar to the Forest Service's State and Private Forestry branch to reach out to non-federal desert and grassland owners and assist them with conservation and restoration of deserts and grasslands.

Purposes of the National Desert and Grassland System and the U.S. Desert and Grassland Service

Congress should establish the National Desert and Grassland System for the purposes of biological diversity conservation, watershed protection, carbon sequestration and compatible recreation.

The purposes of the U.S. Desert and Grassland Service is to conserve and restore biodiversity and watersheds and encourage carbon sequestration on deserts and grasslands of all ownerships.

Box 3: Allocating Some BLM Lands, Resources and Functions to Other Federal Agencies

While the USDGS would specialize in grasslands and deserts management, some public lands and resources currently managed by BLM, including forests, minerals and coastal areas should be transferred to other, more suitable federal agencies.

www.kswild.org

Over 2.6 million acres of BLM lands in Western Oregon are forested and should managed by the Forest Service as part of the National Forest System. The BLM plans to clearcut this several hundred year old stand of old-growth forest in the proposed additions to the Wild Rogue Wilderness and Lower Rogue Wild & Scenic River.

Of lands under complete BLM jurisdiction:

• Approximately 2.6 million acres of mostly forested lands in Western Oregon should be transferred to the National Forest System and managed by the Forest Service.[12]

• Other generally forested BLM lands in eastern Oregon, California, Montana and other states should be transferred to the National Forest System.

• All of BLM's approximately 85 million acres in Alaska (except for Indian and state selected lands) should be transferred to the National Park System, National Wildlife Refuge System or National Forest System, as appropriate.

• Coastal areas managed by BLM should be transferred to the National Wildlife Refuge System.

Of the lands under partial BLM jurisdiction:

• Subsurface minerals managed by BLM on National Forest System, National Park System and National Wildlife Refuge System lands should be transferred to those respective land management agencies. The Forest Service, National Park Service and Fish and Wildlife Service already have jurisdiction over "common" minerals such as sand and gravel on these lands. Combining surface and subsurface ownership within these agencies would improve administration and management of natural resources.

• BLM management of subsurface minerals on Indian Trust Lands should be transferred to U.S. Department of the Interior, Bureau of Indian Affairs.

• BLM management of subsurface minerals on non-federal lands should be transferred to the Minerals Management Service.

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12 *See* A. Kerr. 2007. Transferring Western Oregon Bureau of Land Management Forests to the National Forest System. Occasional Paper #2. The Larch Company. Ashland, OR. (available at www.andykerr.net/downloads).

Acknowledgements

The authors are indebted Jamie Skillen of Valparaiso University for sharing his dissertation on the BLM.[13]

About Andy Kerr

Andy Kerr (andykerr@andykerr.net) is Czar of The Larch Company (www.andykerr.net). A professional conservationist for over three decades, he has been involved in the enactment of over 25 pieces of state and federal legislation, scores of lawsuits, dozens of endangered species listing petitions and countless administrative appeals of Forest Service and Bureau of Land Management timber sales and other decisions. He is best known for his three decades with Oregon Wild (formerly Oregon Natural Resources Council), the organization best known for having brought you the northern spotted owl. He has lectured at all of Oregon's leading universities and colleges, as well as at Harvard and Yale. He is a dropout of Oregon State University. Kerr has appeared numerous times on national television news and feature programs and has published numerous articles on environmental issues. Kerr is author of *Oregon Desert Guide: 70 Hikes* (The Mountaineers Books, 2000) and *Oregon Wild: Endangered Forest Wilderness* (Timber Press, 2004). *The Oregonian* named Kerr one of the 150 most interesting Oregonians in the newspapers 150-year history. He serves as Senior Counselor to Oregon Wild and is an advisor to the Sagebrush Sea Campaign. He also consults for non-profit conservation organizations. Clients have included Campaign for America's Wilderness, The Wilderness Society, Conservation Northwest, Idaho Conservation League, Klamath-Siskiyou Wildlands Center, Soda Mountain Wilderness Council and others. A fifth-generation Oregonian, Kerr was born and raised in Creswell, a recovered timber town in the upper Willamette Valley. He now lives in Ashland, a recovered timber town in the upper Rogue Valley. He works and lives with one wife, one dog, one cat, one horse, 20 odd tropical fish and no vacancies in a state-of-the-art, super-insulated, passive- and active-solar, nontoxic, earth-, people-, and pet-friendly habitat. In his free time, Kerr likes to canoe, hike, raft and read.

About Mark Salvo

Mark Salvo (msalvo@wildearthguardians.org) is Director of the Sagebrush Sea Campaign for WildEarth Guardians (www.WildEarthGuardians.org) and Counselor to the National Public Lands Grazing Campaign (www.publiclandsranching.org, www.permitbuyout.net). He advocates for federal grazing permit retirement and the restoration and protection of sagebrush habitats, flora and fauna. He was born and raised near Portland, Oregon. Salvo earned a B.A. in history from the University of Oregon Clark Honors College and a J.D. from the University of Oregon School of Law. He began his conservation career with American Lands Alliance, sleeping on a floor in Washington, D.C. and defending federal public lands against domestic livestock and the United States Congress. He is presently working to protect greater sage-grouse and Gunnison sage-grouse under the Endangered Species Act. Salvo has published numerous articles in law reviews and journals, and other media, primarily on natural resource policy and related topics. He lives with his wife, Leslie, in Chandler, Arizona. He enjoys traveling, hiking, fishing and remodeling his home.

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13 Skillen, J. R. 2006. The Bureau of Land Management, 1946-2001: From Livestock and Mines to Landscapes and Monuments? Ph.D. Diss. Cornell University. Ithaca, NY.

About The Larch Company

The Larch Company, LLC (www.andykerr.net) is a non-membership for-profit conservation organization that represents species that cannot talk and humans not yet born, and which devotes all profits to environmental conservation. It has two profit centers: the Electrical Power Division and the Political Power Division. EPD owns and operates 7.2 kilowatts of photovoltaic power that provides the electric power requirements of The Larch Company and the home of its principal, Andy Kerr. PPD provides consulting services of Andy Kerr to non-profit conservation organizations and occasionally for-profit businesses (which are charged higher rates). In addition, Larch also undertakes self-initiated projects ("freelance environmental agitations"), most of which are later assumed by a non-profit conservation organization. Larch also occasionally retains other consultants to assist various endeavors.

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#2 Transferring Western Oregon BLM Forests to the National Forest System
#3 Thinning Certain Oregon Forest Types To Restore Ecological Function
#4 Forest Service Administrative Appeals: A Misallocation of Resources
#5 Eliminating Forest Service Regional Offices: Replacing Middle Management with More On-the-Ground Restoration
#6 Establishing a System of and a Service for U.S. Deserts and Grasslands