As reported in today's Wall Street Journal, President Obama has proposed a major government reorganization merging into a single, cabinet-level agency federal trade and commerce responsibilities currently dispersed among a number of different agencies and departments. These reforms, which would require the consent of Congress to implement, would increase government efficiency and reduced federal expenditures. Hard to argue with that, at least in principle.

Buried within the proposal are some specific reforms of direct interest to environmental policy and advocates. The National Oceanic and Atmospheric Administration (NOAA), currently housed within the Department of Commerce, carries out a number of key environmental functions, including weather forecasting. But its most politically-controversial role is administering the federal Endangered Species Act as it relates to marine species. Under the President's proposal, NOAA's ESA-related duties would be transferred to the Department of the Interior, which already has jurisdiction over *terrestrial*-based species under the ESA.

Early media reports indicate that some environmental organizations have expressed opposition to the proposed shift of NOAA's/Commerce's ESA responsibilities to Interior. They argue that NOAA's demonstrated, 40-year expertise in administering the ESA with respect to marine species may be eliminated, and worry that NOAA's duties may get lost within the larger DOI bureaucracy.

I personally believe those concerns to be rather overstated and, at least conceptually, I support the Obama Administration's proposal. Truth be told, I've never understood the wisdom of dividing responsibility to implement the ESA between two different federal agencies, each within different cabinet agencies. If we're really concerned about fiscal savings and government efficiency, we should support efforts to reform and correct such regulatory balkanization.

Department of the Interior

One cautionary note, however: in recent years, Interior's administration of the ESA has been subject to political influence and interference, to a greater degree than has NOAA's. But I chalk that up to the appointed folks involved–especially in the George W. Bush administration–rather than to institutional structure, and to the fact that Interior's ESA-related duties are considerably more extensive than NOAA's. It's hard to argue that the organizational structure of NOAA, vis-a-vis Interior, makes it inherently less susceptible to unprincipled ESA decision-making.

Now, if the Obama Administration would only consider undertaking another environmental reorganization effort: moving the U.S. Forest Service out of the Department of Agriculture and into the Department of Interior, where (in my view) it’s always belonged. After all, doesn’t it make more sense to think of our nation’s forests as valuable, complex natural ecosystems rather than agricultural crops to be harvested?