

# Hunting and Wildlife Conservation Council

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September 21, 2023

The Honorable Deb Haaland  
Secretary  
U.S. Department of the Interior  
1849 C Street, N.W.  
Washington, D.C. 20240

Dear Secretary Haaland:

The Hunting and Wildlife Conservation Council urges the United States Department of the Interior (DOI) to improve and standardize its appraisal processes and functions to ensure successful implementation of numerous land acquisition programs. The Council is concerned that the effectiveness of the Migratory Bird Conservation Act and the Land and Water Conservation Fund (LWCF) are being undermined by structural inefficiencies and policy gaps at DOI. The Council recommends that you return the appraisal function for land transactions to the individual bureaus, significantly shorten appraisal completion timing, modernize policies for utilizing non-federal partners, and strengthen the decision-making authority of the realty functions in each Bureau.

Hunting and fishing in America depend on enhanced public access and conserved habitats. Our community celebrated the Great American Outdoors Act in 2020 with the full and permanent funding of LWCF, and we have long supported implementation of the Migratory Bird Conservation Act. These two programs have had an enormous impact over decades to support our traditions, and we are excited about their potential to further unlock public lands for sportsperson's access and conserve vital habitats for fish and wildlife.

In order for these programs to function as intended, the federal government must create a fair and reasonable playing field to engage with private landowners on real-estate transactions. It is unrealistic to expect willing landowners to wait an unreasonable timeframe when looking to conserve habitat or provide public access through a land acquisition proffer to the Federal government. Because of the potential to miss out on important land acquisition opportunities, we are concerned about chronic and long-standing problems with land appraisal timeframes under DOI's Appraisal and Valuation Service Office (AVSO).

AVSO was created in 2003, and prior to that time, the appraisal function at DOI was carried out by the individual bureaus. Prior to 2003, for example, U.S. Fish and Wildlife Service and National Park Service appraisals typically required 90 days. As of 2021, AVSO aimed to deliver appraisals within 150 days, and averaged over 200 days. Conservation and access opportunities are being lost because of these inefficiencies,

Designated Federal Officer

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and we recommend that appraisals get back to 90-day timeframes. We recommend that you return the appraisal function to the individual bureaus and to move AVSO into an oversight and auditing role, as it does with the numerous federal grant programs.

Additionally, we recommend that DOI update its policies, ensuring authority rests with the Bureaus' realty functions regarding project priorities, project partnerships including utilizing non-federal facilitators, transaction structure, and timing needs.

We recognize and support the oversight actions by the U.S. Congress regarding similar concerns to ours, and we would appreciate an update from appropriate staff on the DOI plan to improve the appraisal process prior to our next Council meeting (date TBD). These collective recommendations will position DOI to take advantage of important conservation and access opportunities—furthering to the conservation and restoration of America the Beautiful—and increase the success of important federal conservation programs.

We would appreciate a response to the recommendations and an update from appropriate staff on the USDA and USFS plan to improve the appraisal process prior to our next Council meeting, the date to be determined.

Thank you for your consideration of our recommendations. Should you have questions or need more information regarding this matter, please contact Doug Hobbs, the Council's Designated Federal Officer, at [doug\\_hobbs@fws.gov](mailto:doug_hobbs@fws.gov) or (703) 358-2336.

Sincerely,



Collin O'Mara  
Chair



John Devney  
Vice Chair

Cc: Matt Strickler, Deputy Assistant Secretary, Fish and Wildlife and Parks  
Martha Williams, Director - U.S. Fish & Wildlife Service  
Charles Sams III, Director - National Park Service  
Tracy Stone-Manning, Director - Bureau of Land Management  
Matthew Huggler, Acting Assistant Director – Office of Communications, U.S. Fish & Wildlife Service