

Hunting and Wildlife Conservation Council

September 19, 2023

The Honorable Thomas J. Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, D.C. 20250

Dear Secretary Vilsack:

The Hunting and Wildlife Conservation Council urges the U.S. Department of Agriculture (USDA) to improve and standardize the appraisal processes and functions within the United States Forest Service (USFS) to ensure the successful implementation of the Land and Water Conservation Fund (LWCF). The Council recommends you eliminate significant appraisal policy and practice inconsistencies among Forest Service Regions, shorten appraisal completion timing, modernize policies for utilizing non-federal partners, and strengthen the decision-making authority of the Forest Service's realty function.

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, which has had an enormous impact over decades to support our traditions. The Council is excited about its potential to further unlock public lands for sportsperson's access and conserve vital habitats for fish and wildlife—we must rise to this opportunity.

For LWCF 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. We are concerned about chronic and regionally divergent problems with appraisal timeframes and practices under the USFS appraisal function. The Council recommends that you take steps to improve appraisal volume and speed, and to standardize efficient appraisal policies and practices across the Regions.

To bridge the gap in landowner timing and funding needs and to provide a public conservation service, partnerships with non-governmental organizations have been paramount to the success of the USFS lands program. Following the enactment of the Great American Outdoors Act, these partnerships are more imperative than ever. Thus, the Council also recommends that you expand partnerships and to standardize land policies and practices across the Regions.

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Additionally, the USFS must update its policies, ensuring authority rests with its realty function regarding project priorities, transaction structure, timing needs, and the utilization of non-federal facilitators. USDA and USFS leadership needs to put an immediate end to mission creep by the appraisal support function, ensuring that conservation efforts are not undermined and that decision-making authority is properly vested. The Council recommends that the USFS update its landownership Manuals and Handbooks for appraisals, purchases and donations and other sections, as necessary.

We recognize and support the oversight actions by the U.S. Congress regarding similar concerns to ours, and we appreciate your responsiveness to their requests. These collective recommendations will position USDA to take advantage of important conservation and access opportunities—furthering the conservation and restoration goals of America the Beautiful—and increase the success of LWCF and other important federal conservation programs and initiatives.

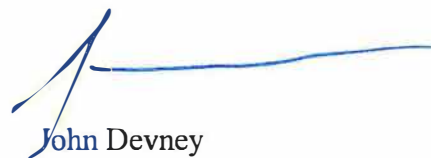
We would appreciate a response to the recommendations and an update from appropriate staff on the USDA and USFS plan to improve the appraisal process prior to our next Council meeting, the date to be determined.

Thank you for your consideration of our request. 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 or (703) 358-2336.

Sincerely,



Collin O'Mara
Chair



John Devney
Vice Chair

Cc: HWCC members
Homer Wilkes, Under Secretary – Natural Resources and Environment, USDA
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Cynthia Martinez, Chief – National Wildlife Refuge System, U.S. Fish & Wildlife Service
Matthew Huggler, Acting Assistant Director – Office of Communications, U.S. Fish & Wildlife Service