

November 5, 2021

The Honorable Deb Haaland
Secretary
U.S. Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Secretary Haaland,

We, the undersigned organizations, are enthusiastic supporters of the Land and Water Conservation Fund (LWCF) and the important work it does to bolster the Administration's America the Beautiful agenda. We commend your historic support for LWCF, which is a fundamental tool to protect land and water for conservation, wildlife habitat, preservation of cultural resources and sacred sites, and has so many long-term benefits for future generations from recreation to climate resilience. Critical to land acquisition is ensuring that National Park Service (NPS) staff on the ground can work successfully with landowners to protect special places across the country. Our concerns outlined below center on a new charter put together under the last administration that adds an unnecessary and burdensome layer of process that could delay land acquisitions and discourage future projects.

We appreciate the Department's focus on enhancing conservation land acquisition processes and outcomes, including the recent decision to pause all planning and activity at NPS related to potential review of land acquisition projects by the agency's Investment Review Board (IRB). We have welcomed and valued NPS staff's recent engagement with stakeholders on this important matter and wholeheartedly support that pause.

In those discussions, we have appreciated NPS staff's clearly stated interest in the end result of that proposed review – chiefly good collaboration and communication between lands and facilities staff for planning and budgetary purposes when acquiring developed properties – and their stated willingness to work with us on alternative ways to achieve those ends. We fundamentally believe that coordination is best achieved within the existing land acquisition priority-setting structure without subjecting these projects to an additional separate decision-making body. NPS has assured us that any planned IRB involvement in land acquisitions has been fully suspended and will in no way impact ongoing or prospective projects as our discussions continue. We appreciate and fully support this move.

We respectfully ask that you work with NPS to remove the land acquisition provisions from the IRB Charter of August 7, 2020, and from any other Facilities Investment Strategy guidance while we work together to explore options for facility-related land acquisition information-sharing. Our concern is that those provisions, added to the IRB charter in the last few months of the previous Administration with neither input from nor consultation with our organizations, would take us backwards by imposing additional process hurdles inconsistent with America the Beautiful, the Great American Outdoors Act, and the need for NPS to expedite and increase land acquisitions. Particularly troubling and overreaching is the IRB's sweeping oversight over all aspects of land acquisition, including land donations from private groups or individuals, as stated

throughout the charter, which specifically authorizes the IRB to “set the direction for...land acquisition.”

As NPS sets its annual land acquisition priorities, we clearly recognize the importance of complete information on future costs related to the very limited number of LWCF projects with significant improvements. However, identification of costs and savings is already a component of the NPS Land Acquisition Ranking System (LARS). Should any additional data or coordination be needed, we are urging NPS to secure it through LARS rather than through additional bureaucracy that could easily hinder land acquisition and frustrate Congressional intent.

We greatly appreciate your engagement and support on this matter. We look forward to working with you and NPS to prioritize now-or-never conservation, historic preservation, and recreation projects that establish the very land base for our National Park System and support its critical mission to protect our irreplaceable national treasures for future generations.

Sincerely,

Appalachian Mountain Club
Appalachian Trail Conservancy
National Parks Conservation Association
National Park Trust
Open Space Institute
The Coalition to Protect America's National Parks
The Conservation Fund
The Nature Conservancy
The Trust for Public Land

*Cc: Shannon Estenoz, Assistant Secretary for Fish and Wildlife and Parks, DOI
Rachael Taylor, Principal Deputy Assistant Secretary, Policy, Management and Budget, DOI
Mike Caldwell, Acting Associate Director, Park Planning, Facilities, and Lands, NPS
Pam McClay, Chief of Land Resources Division, NPS*