

January 17, 2012

Director Dan Ashe
U.S. Fish & Wildlife Service
1849 C Street, NW; Room 3359
Washington, DC 20240

RE: Optimizing Allocation of Land Acquisition Funds

Dear Director Ashe:

I am writing on behalf of Public Employees for Environmental Responsibility (PEER) to urge your consideration of including cost as an explicit factor in setting priorities for acquisition of lands for the National Wildlife Refuge System.

Recently, PEER submitted a Freedom of Information Act (FOIA) request on this topic to your agency. The documents which your agency produced revealed the following:

- The Land Acquisition Priority System (LAPS) used by the Service only accounts for conservation benefits without systematically accounting for costs;
- As a result, refuge lands purchased from Land and Water Conservation Fund dollars are not optimized to provide the maximum return on investment;
- There is strong scientific support that optimization actually enhances the overall conservation benefits achieved by land purchases;
- Agency internal analyses indicate that land acquisition costs are substantial and measurable enough to be incorporated effectively in an optimization process;
- The 2011 White House report, *Sustaining Environmental Capital: Protecting Society and the Economy*, called for federal agencies to increase the positive impact of conservation expenditures by giving highest priority to those expenditures that maximize the conservation benefits gained for each dollar invested...”; and
- Executive Order 13514 (October 5, 2009) declares federal policy that to “support their respective missions, agencies shall prioritize actions based on a full accounting of both economic and social benefits and costs...”

These conclusions are contained in briefing materials which appear to be addressed to you and your chain of command.

Significantly, the more than 500 pages of documents provided to us by your agency did not contain a shred of information countering, minimizing or rationalizing away these conclusions. Most curiously, the documents contained no coherent justification for the current system nor do they provide an explanation as to why the Fish & Wildlife Service refuses to optimize its land acquisitions.

Accordingly, I am writing you to seek an explanation for failure of the Fish & Wildlife Service to include cost factors in its land acquisition priority system. If there is no compelling rationale for this posture, I would urge you to commence optimization in Fiscal Year 2013.

Thank you for your attention to this matter.

Cordially,

Jeff Ruch
Executive Director