

Richard Rawson

To: Al Wagner/COSO/CO/BLM/DOI@BLM
10/23/02 11:50

cc: Dan Nowell/AZSO/AZ/BLM/DOI@BLM,
Debbie AM Hoback/COSO/CO/BLM/DOI@BLM, Don Dunn/IDSO/ID/BLM/DOI@BLM, Don Shepard/WYSO/WY/BLM/DOI@BLM, Helen Honse/ORSO/OR/BLM/DOI@BLM, Jenny Saunders/COSO/CO/BLM/DOI@BLM, John Beck/COSO/CO/BLM/DOI@BLM, Nancy Ortiz/CASO/CA/BLM/DOI@BLM, Paul Rose/NVSO/NV/BLM/DOI@BLM, Phyllis Brosz/MTSO/MT/BLM/DOI@BLM, Shawn Redfield/AZSO/AZ/BLM/DOI@BLM,
Timothy J Hansen/COSO/CO/BLM/DOI@BLM,

Subject: Re: Exchange Reviews

I think we are all preaching to the choir. Review of the review is nothing new in some circles. However, it is usually done on a spot basis as a quality control tool and as a monitoring vehicle to determine review staff training needs. Somehow, I get the impression that those two areas are not the motivating force behind this effort. Those responsible for this new layer of review policy may or may not want our input or assistance. Still, important questions need answers. Will the 2nd layer review be administrative or technical? If technical, why not just skip the local review. Have each State Lead Appraiser use the delegated authority to approve or recommend value after the completion of the Washington Office secured appraisal review? This would cut my workload a bunch and give someone else the review headache. Personally, I think overall quality might suffer but what the hey. Maybe, the WO could obtain some proponent ordered reviewers to scrutinize the appraisals and reviews. Wouldn't that be Swell (oops, a typo there--- I meant "swell").

I was told this morning that Terry Catlin (WO) has been delegated the responsibility for policy writing in this area. I have not confirmed this nor have I had an opportunity to discuss the matter with her. But I'm not surprised.

Richard Rawson

To: Don Shepard/WYSO/WY/BLM/DOI@BLM
10/23/02 03:59

cc: Al Wagner/COSO/CO/BLM/DOI@BLM, Dan PM Nowell/AZSO/AZ/BLM/DOI@BLM, Debbie Hoback/COSO/CO/BLM/DOI@BLM, Don Dunn/IDSO/ID/BLM/DOI@BLM, Helen Hense/ORSO/OR/BLM/DOI@BLM,

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Subject: Re: Exchange Reviews

FYI. Today I had a 10 minute conversation with Terry Catlin about the third party reviews. She claims not to be driving this issue from a policy standpoint, but is taking on an assistance role only. Things are pretty sketchy at the current time. However, it appears that at least for the next six months that all administrative exchange appraisals and reviews obtained or written by the BLM appraisers will not be acceptable until they undergo this 3rd party review. The WO policy makers interpret the Appraisal Foundation Report to say that all appraisals conducted by BLM staff could be tainted because of undue pressure placed on them.

Therefore to ensure reasonableness of the reports and reviews, the third party reviews will be conducted. Putting it in plain english---BLM appraisal staff work is not now considered credible without outside concurrence. Terry said that she will not concur with any BLM generated work for exchanges without the third party technical type review. She was not sure of the type of review (technical vs. administrative) but given the concern of the reasonableness of the concluded values, it is a safe bet that the reviews will be Standard 3 technical reviews. The WO is currently working on identifying the projected third party reviewer workload and also moving forward on a contract for a third party reviewer(s). Terry also stated that it is her impression that "directed legislated exchanges" may not be subject to these third party reviews and likely will not need to have supporting appraisal products.

Terry said that she suggested in WO meetings that the Chief Appraisers have a voice on the committee. However, she said that was not a foregone conclusion. There are at least two different action plans being studied in Washington. My impression is that the train has left the station.