



# U.S. Department of the Interior Office of Inspector General

## Evaluation Report on the Department of the Interior's Appraisal Operations

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# United States Department of the Interior

OFFICE OF INSPECTOR GENERAL  
Washington, DC 20240

DEC 23 2009

## Memorandum

To: Rhea Suh  
Assistant Secretary – Policy, Management and Budget

From: Mary L. Kendall   
Acting Inspector General

Subject: Evaluation Report on the Department of the Interior's Appraisal Operations  
(Report No. WR-EV-OSS-0012-2009)

This memorandum presents the results of our evaluation of appraisal services provided by the National Business Center's (NBC) Appraisal Services Directorate (ASD). We began this evaluation in May 2009 to assess the efficiency and quality of appraisal operations.

We found that appraisal operations are impeded by a combination of factors, several of which are not within ASD's ability to control. Specifically, we found that ASD's ability to become a strong and independent appraisal organization as envisioned by the Secretary has not been fully realized due to a collective lack of support from NBC, the bureaus, and the Department of the Interior (Department). This lack of support is compounded by the fact that ASD has essentially become dependent upon others to address policy and enforcement issues as the agency has been without consistently strong leadership for the past 3 years.

In its October 2009 House Report 111–316, Congress directed the Department to revisit the appraisal services consolidation so as to immediately address concerns over delays in obtaining adequate appraisals for acquisition of Federal lands.

Given the findings of our review, as well as those concerns voiced by Congress, we believe the Department's appraisers must remain organizationally independent of the agency personnel responsible for acquiring or exchanging land for mission-related purposes. This report contains three recommendations that address those issues presently obstructing ASD's ability to succeed.

The legislation, as amended, creating the Office of Inspector General (OIG) requires that we report to Congress semiannually on all audit reports issued. We appreciate the cooperation shown by the Department bureaus and offices during our review. We ask that you inform us of the Department's planned course of action on the recommendations within 30 days.

If you have any questions regarding this evaluation, please do not hesitate to call me at (202) 208-5745.

cc: Deputy Secretary  
Associate Director, Finance Policy & Operations  
Deputy Assistant Secretary for Budget and Business Management  
Director, National Business Center

## SYNOPSIS

The Appraisal Services Directorate (ASD) is not the strong and independent appraisal organization envisioned by the Secretary at its inception in 2003. From the outset, both external and internal obstacles have impeded ASD's ability to fulfill its mission and provide the Department with timely, independent appraisals and valuation services.

We began this evaluation in May 2009, after discussing concerns regarding ASD with the Acting Assistant Secretary for Policy, Management and Budget. Our evaluation found that ASD has not received the external support necessary within the Department of Interior (Department) to assume full control over the appraisal function. The National Business Center (NBC), the bureaus, and the Department do not collectively support ASD. Specifically, NBC has failed to provide timely services to ASD and has little incentive to do so. ASD's bureau clients, the Bureau of Land Management, U.S. Fish and Wildlife Service, National Park Service, and Bureau of Reclamation, remain unconvinced of the need for a consolidated organization and have repeatedly acted to regain control of the appraisal function, thus undermining ASD as an organization. Further, the Department has not actively intervened to address these issues and protect ASD's independence and operational integrity.

In addition to these external obstacles, ASD has been weakened internally by the absence of strong leadership, a failure caused in large part by its placement within NBC. This is illustrated by ASD's complete dependence on the Assistant Secretary – Policy, Management and Budget (AS–PMB) and the bureaus to address contracting problems. Because of this, ASD is unable to complete its appraisal function in a timely manner.

In its October 2009 House Report 111–316, Congress directed the Department to revisit the appraisal services consolidation to immediately address delays in obtaining adequate appraisals for the acquisition of Federal lands. Based on our findings as well as the concerns recently voiced by Congress, we believe that the Department's appraisers must remain organizationally independent of the realty personnel in the bureaus. We have made recommendations designed to ensure that ASD has full control of the contracting process, strong and effective leadership, and an organizational placement that enables ASD to provide timely, independent appraisals and valuation services.

## BACKGROUND

### The Importance of Land Appraisals

#### *Ensuring Integrity, Accountability, and Transparency*

The land appraisal process is a key control for ensuring integrity, accountability, and transparency in public land acquisitions and land exchanges, with the Federal appraiser fulfilling a critical advisory service through their ascertainment of market value.

#### *Land Acquisition*

At the Department, land appraisals are mostly for unimproved properties located in rural areas, as the mission of its bureaus largely focuses on the stewardship of public lands, conservation of wildlife, management of national parks, and protection of natural resources. Appraisals are performed to support the acquisition of land or easements, exchange of Federal and nonfederal lands, leases, permits or license, revenue sharing with local governments, and land disposals via sale. Over the past 4 years, the Department's appraisers have been responsible for the valuation of nearly 8 million acres of land with a combined value of almost \$10 billion. (See Table.)

<b>FY</b>	<b>ACREAGE</b>	<b>APPRAISED VALUE (in Billions)</b>	<b>APPRAISERS (FTEs)</b>
<b>2006</b>	3,045,132	\$2.86	56
<b>2007</b>	1,578,072	\$1.58	51
<b>2008</b>	1,034,072	\$2.31	51
<b>2009</b>	2,256,673	\$3.06	57
<b>TOTAL</b>	<b>7,913,949</b>	<b>\$9.81</b>	

#### *Ensuring Fair Compensation*

In acquiring real property, it is the United States' policy to impartially protect the interests of all by ensuring that compensation paid is fair, not only to the individual that owns the property, but also to the public who pays for it. The Fifth Amendment of the United States Constitution states that private property will not be taken for public use without just compensation, and the United States courts have adopted the concept of market value as the measure of just compensation. For this reason, it is the general policy of the United States that all Federal land acquisitions be based on market value appraisals.

## *The Necessity of Appraiser Independence*

The quality of an appraiser's services in ascertaining market value is negated when appraiser independence is compromised by excessive pressure to meet management and political objectives. Prior to the Secretary's 2003 creation of a consolidated Departmental appraisal organization, appraisers reported to and received performance evaluations from bureau realty managers responsible for completing land transactions for the Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (FWS), National Park Service (NPS), and Bureau of Reclamation (BOR). As a result, bureau appraisers' responsibility to determine market value frequently conflicted with, and was compromised by, realty managers' drive to expedite land transactions and "make the deal." This threat to appraiser independence, however, is not unique to government as both the Appraisal Institute<sup>1</sup> and The Appraisal Foundation (Foundation)<sup>2</sup> have highlighted client pressure as perhaps the most visible threat to appraisal integrity.

With over 40 years of observation by the Office of Inspector General (OIG), the Government Accountability Office (GAO), and other professional organizations, we have seen that the compromising of appraiser independence was all too common within the Department when appraisal staff worked directly for the agencies. From as early as our 1968 OIG report,<sup>3</sup> and as recently as a 2002 Foundation report,<sup>4</sup> independent reviews of the Department's realty and appraisal operations conclude that the placement of appraisal operations within the bureaus deemphasize the significance of the appraisal product and restrict the function's independence by making it subservient to management and realty staffs' drive to successfully close transactions. The reports ultimately recommend the creation of a single Departmental appraisal and appraisal review organization so as to assure appraiser independence and to protect the public interest.

### **The Creation of ASD**

In 2002, the Department created a Land Transaction Working Group (LTWG) to address land transaction issues at the policy level. With the Foundation's highly critical report as a stimulus, the LTWG focused its attention on the Department's appraisal operations. LTWG concluded that past efforts to remedy appraisal problems, which typically involved refining or augmenting program guidance, had proved ineffective. The efforts were ineffective because they did not address the underlying issues of appraiser independence and inconsistent application of appraisal standards. The LTWG concluded that significant restructuring was necessary and, like the previous reviews by the OIG and the Foundation, recommended that the Secretary consolidate the bureaus' real property appraisal functions in a new Departmental office.

The former Secretary approved the LTWG's recommendation and, in November 2003, formally consolidated the Department's appraisal operations with the creation of the ASD. Through ASD, the Department would be provided with a strong appraisal organization with unified lines of supervision meant to protect appraiser independence from undue influence, enhance the

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<sup>1</sup> The Appraisal Institute is a global membership association of professional real estate appraisers who work to advance professionalism and ethics, global standards, methodologies, and practices through professional development of property economics worldwide.

<sup>2</sup> The Appraisal Foundation is a nationally recognized organization chartered by the Congress to oversee the implementation of appraisal standards and assure the professionalism of appraisers.

<sup>3</sup> "Review of Departmental Land Appraisal Activities," Office of Survey and Review (March 1968).

<sup>4</sup> "Evaluation of the Appraisal Organization of the Department of Interior Bureau of Land Management" (October 2002).

reliability of Department appraisals, and ensure unbiased valuation services that meet Federal appraisal standards<sup>5</sup> and represent a fair value for both the private landowner and Federal taxpayers. This fundamental reform was meant to change the way the Department conducted business and to gain the respect of both the public and the dedicated professionals in its appraisal and realty programs.

At the suggestion of the LTWG, the Secretary placed ASD within the NBC. ASD's placement was based in the belief that NBC was well-suited to provide ASD with necessary support functions including budget, human resources, fiscal services, and contracting. As no party conducted a complete workload analysis of the Department's appraisal needs, funding of ASD was based on partial analysis provided by the bureaus to the AS-PMB, with budgeted allotments increasing with each fiscal year. While not included in the Department consolidation, ASD has provided oversight of the Office of Special Trustee's Office of Appraisal Services since 2007. ASD is currently organized into seven regional offices that report to a Chief Appraiser located in Washington, D.C.

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<sup>5</sup>The Federal appraisal standards are the "Uniform Appraisal Standards for Federal Land Acquisitions," published by the Interagency Land Acquisition Conference, 2000.

## RESULTS

### **Introduction**

ASD is not a strong and independent appraisal organization as envisioned by the Secretary. Both external and internal obstacles have impeded ASD's ability to fulfill its mission and provide the Department with timely, independent appraisals and valuation services.

ASD's external obstacles take form in its inability to assume full control over the appraisal function. The inability to assume control is due to an absence of support from NBC, the bureaus, and the Department. Internally, the nonexistence of leadership, caused by its placement within NBC, has weakened ASD's ability to timely complete the appraisal function.

### **External Obstacles**

ASD does not have full control over and responsibility for the appraisal process. This is due to its absence of support from NBC, the bureaus, and the Department. Specifically, NBC has little incentive to provide timely support services to ASD. In addition, bureau clients still refute the need for a consolidated organization and take actions to recover control of the appraisal function. Further, as the lead for all agencies involved, the Department's Office of Policy, Management and Budget has not actively intervened to address these impediments.

#### *NBC Does Not Provide Timely Support and Services*

NBC's contracting process is a constant source of frustration to ASD and the bureaus. The advertisement and award of contracts are delayed for a number of reasons that include difficulty coordinating funding documents and statements of work and the time required to add or refund monies due to changes in appraisal costs or re-contracting in the case of unsuccessful bids. As neither ASD nor the bureaus have control over the function and no authority to hold NBC's acquisition offices accountable for delivery times, no workable solution has been found.

In addition, GAO noted in a 2006 report<sup>6</sup> that NBC staff had little incentive to provide services in a timely manner because ASD has no choice but to use its services. The report also notes that this situation would not change under the then current plan to relocate the function to another NBC contracting office. Despite this warning, the shift occurred and contracting remained a frustration for 3 more years until, in June 2009, the AS-PMB allowed the return of the function to the bureaus.

The AS-PMB's decision to place ASD within NBC was based on the reasoning that NBC was already the provider of Department-wide business and administrative services and was, therefore, ideally suited to provide the appraisers with administrative and infrastructure support, including efficient contract monitoring and management.

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<sup>6</sup> "Interior's Land Appraisal Services: Actions Needed to Improve Compliance with Appraisal Standards, Increase Efficiency, and Broaden Oversight," United States Government Accountability Office (Report GAO-06-1050, September 2006).



NBC advertises that the partnership and business ventures between NBC and its clients are the basis for mutually beneficial business results and that its efficiency and expertise in providing quality administrative services allow its clients to concentrate on their core missions. Specific to contracting, NBC states that the specialized skills of its personnel has resulted in standardized practices, continuity of expertise, and increased productivity of its resources. With regard to ASD, however, NBC proved to be either unable or unwilling to provide timely contract support.

### *The Bureaus Act to Regain Control of the Appraisal Process*

With the bureaus' regaining of the contracting function, the AS-PMB issued guidance in June 2009 that identifies roles and responsibilities of ASD and the bureaus designed to safeguard and ensure the integrity and independence of the appraisal product. Such safeguards are a prudent business practice and also serve to protect ASD from those bureaus that wish to see the appraisal function returned to them. For example, both NPS and FWS expressed such a desire during our discussion with them.

Despite the AS-PMB's June 2009 guidance, however, the bureaus have subsequently violated a number of those outlined safeguards. One such requirement is that any bureau electing to use its own contracting office would need to implement a Memorandum of Understanding (MOU) with NBC. The guidance included a standardized MOU that is to be used for this purpose.

While all bureaus have currently opted to use their own contracting offices to procure appraisals, they have done so without implementing the required formal agreements. Furthermore, some bureaus have seized upon the return of the contracting function as an opportunity to try to regain control over the appraisal process. For example, we noted that NPS violated at least two elements of the AS-PMB's guidance by seeking contractors outside of an ASD-supplied bidder list and, in at least one case, awarding a contract to an appraiser that ASD had specifically identified as "not recommended" because their previous work products were "not acceptable."

### *No Departmental Intervention*

Despite its overall knowledge that the appraisal contracting struggle exists, the Department has not acted while ASD flounders in NBC and has not responded as bureaus circumvent rules designed to maintain the accountability and credibility of the appraisal process. Since ASD's inception in 2003, the contracting function progressed unsuccessfully through three separate NBC contracting offices before the AS-PMB returned contracting to the bureaus in April 2009. Even though the contracting process for appraisal services was addressed with guidelines in June 2009, the AS-PMB has neither enforced nor ensured the bureaus adherence to those guidelines.

The contract function is a vital piece of the appraisal delivery process as nearly 80 percent of the Department's appraisal and review workload involves the contracting of work to nonfederal appraisers. All of these contract appraisals must meet rigorous Federal appraisal standards required by ASD which, as the GAO noted in its 2006 report, makes it that much more difficult to find willing and qualified contractors. GAO also reported that contracting for appraisal services through NBC had not worked in the past and it was uncertain if it would work in the future.

Based on our experience with the Department's implementation of the appraisal function since 2003, we believe that frustrations over delays and the laying of blame will continue to occur so long as ASD does not have complete control over and responsibility for the contracting function.

## **Internal Obstacles**

ASD is unable to meet the goals and expectations originally envisioned and presently expected because it has essentially become a dependent office. Its placement within NBC has caused an absence of consistently strong leadership and made ASD overly reliant upon AS-PMB and the bureaus. Without the leadership necessary to address contracting frustrations and combat efforts by the bureaus to regain control over the appraisal function, ASD cannot be the independent and strong appraisal service necessary to fulfill its proposed function.

### *Absence of Leadership*

With the initial momentum of ASD's creation in 2003, the presence of a technically competent Chief Appraiser served to strengthen the new appraisal organization through the development and issuance of new policies and procedures. Such improvements included the issuance of a new appraisal policy manual and the creation of a web-based tracking system, the Appraisal Request and Review Tracking System, to track requests made by each bureau and to maintain information on ASD workload and accomplishments.

Since the first Chief Appraiser vacated the position in 2006, however, the position has not been filled by a fully qualified Senior Executive for almost 3 full years. In the interim, ASD has been led by a series of well-intentioned acting Chiefs and, for 1 year, by a Chief Appraiser who was not technically qualified to hold the position. We found that NBC selected the unqualified Chief Appraiser as a result of its focus on customer service and business experience, with a de-emphasis on technical appraisal skills and qualifications. NBC hired this person despite other well-qualified appraisers having applied for the position.

Unfortunately, this lack of consistent, competent, and empowered leadership remains to date as the Department decided not to proceed with the selection of a new ASD Chief Appraiser in June 2009. Instead, in October 2009, the Chief Appraiser's position was once again placed in the hands of yet another temporary caretaker. Without the presence of a strong Chief Appraiser as lead, ASD cannot become a strong appraisal organization and cannot work to enforce policy directives, such as those outlined by the AS-PMB regarding contracting safeguards.

With the benefit of hindsight, we believe that the Secretary's placement of ASD within NBC is a hindrance to the appraisal organization. While this placement initially appeared to be of mutual benefit to both offices, it has instead served to weaken ASD's ability to become a successful appraisal organization as it has contributed to the untimely delivery of appraisal products and prompted the AS-PMB to eventually return the contracting function to the bureaus.

## CONCLUSION AND RECOMMENDATIONS

Providing professional appraisal services will always be a balancing act for ASD. On the one hand, ASD needs to function effectively and efficiently and deliver appraised value estimates and other products to the agencies in a timely manner. On the other hand, ASD must adhere to a set of professional Federal appraisal standards and ensure that credible and unbiased appraisals are produced for agency use.

Adhering to professional standards and ensuring that lands to be acquired or exchanged are properly valued unavoidably adds time and creates hurdles that frustrate agency managers and private parties. ASD's external and internal obstacles are exacerbating the delays that are inherent in the process.

Given our findings and Congress's concerns voiced in its October 2009 House Report 111-316, we believe that ASD must be organizationally independent of the agency realty personnel and must have full control of the contracting process. Because of the need for a strong and independent appraisal service, we recommend that the AS-PMB take the following actions:

1. Delegate responsibility to, and provide the necessary resources for, ASD's complete control over the contracting function.
2. Ensure that a strong and competent Chief Appraiser is selected to lead further change within ASD and to provide a single point of contact, offer sound judgment and have final decision authority on appraisal matters; and,
3. Revisit the organizational placement of the Department's appraisal operations and consider making ASD an independent office within the Office of Policy, Management and Budget in order to reinforce ASD's ability to successfully and independently perform appraisal-related activities.

## APPENDIX 1: Objective, Scope, and Methodology

The objective of our evaluation was to assess the efficiency and quality of appraisal operations of ASD. In conducting our review, we found that appraisal operations are impeded by a combination of factors, several of which are not within ASD's ability to control. Thus, our objective became focused on policy and programmatic issues at the Departmental level believed to be the underlying impediments to ASD's providing efficient and quality services.

We conducted our review from May 2009 through July 2009, which included the review of ASD policy and practices for identifying appraisal process characteristics such as timeliness and appraiser professionalism. We also interviewed ASD management, appraisers, and support staff, as well as realty staff from the bureau clients, to understand both the successes and frustrations that exist within the appraisal delivery process. To gain additional insight, we spoke with Departmental officials within the Office of the Secretary, the Chief Appraiser for the Department of Agriculture's Forest Service, the Chief Appraiser for the Department of Justice, and a representative of the Trust for Public Land, one of the primary nongovernment organizations with which the bureaus conduct business. (See Appendix 3 for sites visited or contacted.)

The scope of our review covered fiscal years 2006 through 2009. We conducted our evaluation in accordance with the "Quality Standards for Inspections" as put forth by the President's Council on Integrity and Efficiency. Accordingly, we included such tests of records and other procedures that were considered necessary under the circumstances. To accomplish our objective, we conducted the following activities:

- Reviewed applicable laws, regulations, and Department and bureau policies including those practices used with implementation. Such policy and practice review was specific to the Department, NBC, ASD, and bureaus as they relate to the contracting of appraisal services and the hiring of the NBC-ASD Chief Appraiser.
- Determined the appraisal universe within ASD purview and reviewed a small, judgmental sample of ASD appraisal records that were identified by the bureaus and ASD as reflecting appraisal processes delays and concerns.
- Interviewed Department (i.e., Office of Policy, Management and Budget, NBC, ASD), bureau, U.S. Forest Service, U.S. Department of Justice, and non-government organization appraisal and realty specialists.
- Reviewed NBC's Strategic Plan and other related documents. NBC's strategic direction for ASD's line of business is to (1) establish consistent Appraisal Departmental policies and procedures; (2) refine standard operating procedures and business processes; (3) establish compliance inspection and continuous improvement program; and, (4) expand appraisal service offerings in minerals, timber, and water evaluations.
- Reviewed Congressional Conference Report 111-316, dated October 2009, which directed the Department of the Interior to revisit the Department-wide appraisal services consolidation and immediately address the undue delays in obtaining appraisals for Federal land acquisition projects.

## APPENDIX 2: *Prior Audit Coverage*

GAO has conducted two reports subsequent to the Department's consolidation of its appraisal function. Its September 2006 report, "Interior's Land Appraisal Services: Actions Needed to Improve Compliance with Appraisal Standards, Increase Efficiency, and Broaden Oversight" (GAO-06-1050), GAO recommended that ASD establish and implement internal controls to include standardized review procedures, effective accountability framework, and a compliance program. It was also recommended that appraisals be assigned to appraisers with appropriate experience and skill. In addition, GAO issued a June 2009 report, "Federal Land Management: BLM and the Forest Service Have Improved Oversight of the Land Exchange Process, but Additional Actions Are Needed" (GAO-09-611), in which GAO touched on the Department's progress in implementing its 2006 recommendations.

Prior to the consolidation of the Department's appraisal function, the OIG and GAO reported extensively on deficiencies in appraisals used by BLM, FWS, and NPS to buy and exchange land. A few examples are:

- May 1956, "Report of the Committee on Land Appraisal Practices in the Department of the Interior" (Issued by the Department of the Interior). The report contained 27 recommendations with heavy emphasis on organization, staffing, training, development of standards, and direction and supervision from the Secretariat level.
- March 1968, "Review of Departmental Land Appraisal Activities" (Issued by OIG's predecessor, DOI's Office of Survey and Review). The report recommended "creation of a single Department appraisal organization" because "the organizational placement of the appraisal function in most bureaus tends to restrict independence and to deemphasize the significance of the appraisal as an end product."
- June 1991, "Land Exchange Activities, BLM" (OIG Report No. 91-I-968). We reported that the government did not receive fair value under the exchange program because appraisals used by BLM did not comply with Federal appraisal standards, or because approved land value information had been changed by unauthorized personnel.
- May 1992, "Land Acquisitions Conducted with the Assistance of Nonprofit Organizations, Department of the Interior" (OIG Report No. 92-I-833). We reported that Departmental agencies established land values based on appraisals that did not follow appraisal and property valuation standards. Non-profit organizations unduly profited from some land acquisition transactions because appraisals were not timely, independent, or adequately supported.
- July 1996, "Nevada Land Exchange Activities, BLM" (OIG Report No. 96-I-1025). We found that BLM's Nevada State Office did not ensure that fair and equal value was received in completing the exchanges we reviewed.

- March 1998, “The Del Webb Land Exchange in Nevada, BLM” (OIG Report No. 98–I–363). We reported that BLM’s Washington Office did not conform to established standards, procedures and controls for appraisals and land valuations and ignored the objections of its Nevada State Chief Appraiser on this large and politically sensitive land exchange. Had external pressure not caused BLM to obtain a second appraisal, the government would have lost \$9.1 million on the exchange.
- September 1998, “Follow-up of Nevada Land Exchange Activities, BLM” (OIG Report No. 98–I–689). We reported that the Bureau had been unsuccessful in its efforts to establish controls to ensure that land was properly valued and that, as a result, \$18.2 million was lost on three large land exchanges. We therefore recommended that BLM identify its land exchange program as a material weakness in the Department’s accountability report and that BLM place a moratorium on land exchanges in Nevada pending establishment of an independent land exchange review team.
- June 2000, “BLM and the Forest Service: Land Exchanges Need to Reflect Appropriate Value and Serve the Public Interest” (GAO Report No. RCED–00–73). GAO corroborated many of our earlier findings and went so far as to suggest that Congress should consider directing BLM to discontinue the land exchange program because of the inherent problems associated with appraising lands for exchange.
- July 2001, “Land Exchanges and Acquisitions, Bureau of Land Management Utah State Office” (OIG Report No. 2001–I–413). We reported that the appraisal process was not objective and appraisal reviews did not meet standards. Recommendations were made for a peer review by The Appraisal Foundation (Foundation) and the implementation of the Foundation’s subsequent recommendations.
- October 2002, “Evaluation of the Appraisal Organization of the Department of Interior Bureau of Land Management” (The Appraisal Foundation, Contract No. NAC020051). The Foundation considered the July 2001 DOI, OIG report and responded to the request for evaluation. They recommended the establishment of a separate agency for the development and review of appraisals as a centralized agency. They also recommended that a compliance officer be established.

### APPENDIX 3: Sites Visited or Contacted

<b>Office</b>	<b>Location</b>
<b>FWS Headquarters</b>	Arlington, VA
<b>NBC-ASD Southeast Region</b>	Atlanta, GA
<b>NPS Southeast Region</b>	Atlanta, GA
<b>FWS Southeast Region</b>	Atlanta, GA
<b>NPS Intermountain Regional Office</b>	Denver, CO
<b>NBC Acquisition Services Directorate</b>	Lakewood, CO
<b>FWS Mountain-Prairie Regional Office</b>	Lakewood, CO
<b>BOR Denver Federal Center Office</b>	Lakewood, CO
<b>BLM Colorado State Office*</b>	Lakewood, CO
<b>Trust for Public Land</b>	San Francisco, CA
<b>NBC-ASD Headquarters</b>	Washington, D.C.
<b>BLM Headquarters</b>	Washington, D.C.
<b>NPS Headquarters</b>	Washington, D.C.
<b>U.S. Department of Justice</b>	Washington, D.C.
<b>U.S. Forest Service*</b>	Washington, D.C.
<b>Office of Policy, Management and Budget</b>	Washington, D.C.

*\*Denotes sites that were contacted but not physically visited.*

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