

Submitted electronically via regulations.gov

June 12, 2017

Mr. Mick Mulvaney, Director  
Office of Management and Budget  
725 17th St., NW  
Washington, DC 20503

Re: Notice of Request for Comment on Government-wide Reform

Dear Director Mulvaney:

We are economists working in academic, management, research and other capacities that have enabled us to view first-hand the important role that federal land management agencies play in supporting vibrant local economies and generating jobs. **We write to you today to express our strong support for continued and robust investment in the land management agencies -- the U.S. Forest Service, U.S. Fish and Wildlife Service, National Park Service, and the Bureau of Land Management – and their conservation programs.** Together, these agencies administer on behalf of the American people 674 million acres of lands that see over half a billion visits annually.<sup>1</sup>

On March 13<sup>th</sup> 2017, the President signed [Executive Order 13781](#) directing you to develop a plan for reorganizing the executive branch including recommending agencies, programs, and functions for elimination. Subsequently, you launched [a 28-day comment period](#) asking the American public to weigh in on how to reorganize, reduce, and eliminate agencies.<sup>2</sup> While we disagree with the premise that drastic changes to our federal land management agencies are necessary, to the extent that you intend to reorganize and possibly eliminate agencies, we respectfully request that you consider the economic importance of the federal land management agencies and their conservation programs.

The federal land management agencies yield an impressive return on investment. Their funding accounts for less than 0.4% of the nation's annual budget<sup>3</sup>, yet provides the American people with innumerable benefits worth billions of dollars. They fuel a robust economic engine including a growing outdoor recreation economy valued at \$887 billion annually and tied to 7.6 million jobs.<sup>4</sup> They also provide this nation with clean water and air, trails and campgrounds, fishing and hunting, and unmatched outdoor experiences. While these services are not bought and sold in stores, they are worth a lot. Consider that the National Wildlife Refuge System alone provides ecosystem service valued

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<sup>1</sup> See US Forest Service, 2012. National Visitor Use Monitoring Report. Available at: [https://www.fs.fed.us/recreation/programs/nvum/2012%20National\\_Summary\\_Report\\_061413.pdf](https://www.fs.fed.us/recreation/programs/nvum/2012%20National_Summary_Report_061413.pdf). Page 24; National Park Service. Annual Visitation Highlights. Available at: <https://www.nps.gov/subjects/socialscience/annual-visitation-highlights.htm>; Department of the Interior, Bureau of Land Management. 2015. Public Lands Statistics. Page 186; U.S. Fish & Wildlife Service, 2015. Annual Performance Report FY2015: National Wildlife Refuge System. Page 3.

<sup>2</sup> 82 Fed. Reg. 22355 (March 15, 2017)

<sup>3</sup> Office of Management and Budget Historical Tables for Sub-Function 302. Available at: <https://obamawhitehouse.archives.gov/omb/budget/Historicals>

<sup>4</sup> Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

at \$32.3 billion to nearby rural communities<sup>5</sup>, and national forests, the single largest source of municipal water supply, services over 66 million people in 3,400 communities. The value of this water is over \$7.2 billion annually.<sup>6</sup>

Further, federal public lands are integral to sustaining healthy local economies. In today's economy many businesses are free to choose the location for their entrepreneurial endeavors. Federal public lands – and especially protected lands -- are important for attracting and retaining talented workers, entrepreneurs and investors. Rural counties with higher levels of protected public lands have higher incomes, higher employment levels and greater population growth than rural counties that lack such lands.<sup>7</sup> Federal land management agencies provide jobs many of which are located in rural communities. These jobs in turn create spillover employment—for example, research shows that every job in the U.S. Forest Service is linked to significant additional employment.<sup>8</sup>

We recognize that the American public wants our federal agencies to be efficient and provide high value benefits to the American people. We do too. The federal land management agencies, through their conservation programs that protect our air, water and wildlife, produce an outsized rate of return. From an economic perspective, it only makes sense to continue and increase the investment in these agencies and their conservation programs.

Thank you for considering these comments.

Sincerely,

*The following individuals have endorsed the contents of this letter. Institutional references are provided for identification only.*

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<sup>5</sup> Southwick Associates, 2011. The Economics Associated with Outdoor Recreation, Natural Resources Conservation and Historic Preservation in the United States For: The National Fish and Wildlife Foundation. Available at:

<https://www.fws.gov/refuges/news/pdfs/TheEconomicValueofOutdoorRecreation%5B1%5D.pdf>

<sup>5</sup> Outdoor Industry Association, 2017. The Outdoor Recreation Economy. Page 11. Available at: <https://outdoorindustry.org/resource/2017-outdoor-recreation-economy-report/>

<sup>6</sup> USDA Forest Service. Information on Water Resources. Available at:

[https://www.fs.usda.gov/wps/portal/fsinternet/cs/detail!/ut/p/z/0/04\\_Sj9CPYkssy0xPLMnMz0vMAfjo8zjiQwggwNHCwN\\_Di8zPyBcqYKBfkO2oCA\\_BZcx5g/?position=Contribution%20Content.Html&pname=Forest%20Service&ss=119995&navtype=SubNavigation&pnavid=11014010000000&navid=110140110000000&ttype=detail&cid=stelprdb5107778](https://www.fs.usda.gov/wps/portal/fsinternet/cs/detail!/ut/p/z/0/04_Sj9CPYkssy0xPLMnMz0vMAfjo8zjiQwggwNHCwN_Di8zPyBcqYKBfkO2oCA_BZcx5g/?position=Contribution%20Content.Html&pname=Forest%20Service&ss=119995&navtype=SubNavigation&pnavid=11014010000000&navid=110140110000000&ttype=detail&cid=stelprdb5107778)

<sup>7</sup> Headwaters Economics, 2017. Federal Public Lands in the West: Liability or Asset. Available at: <https://headwaterseconomics.org/public-lands/federal-lands-performance/>

<sup>8</sup> US Forest Service, 2012. Final Environmental Impact Statement for the Land Management Planning Rule, Appendix M. Available at [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5349160.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5349160.pdf)

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